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These Policies and Procedures are reviewed annually in October. Last updated 15/10/2026

AIM AND OBJECTIVES

Explore Learning offers award-winning tuition to children across the UK. Our mission is to change children's lives by nurturing the skills and attitudes to become fearless learners to enable them to thrive in their education and beyond. Our goal is to be the UK's leading tuition provider, with vibrant, growing memberships and profitable centres and communities.

We operate across the whole of the UK in our own centres and communities, in schools and online, and we offer a range of membership packages to suit every learner. But we're more than just maths and English tuition. At Explore Learning, we have a proven record of enabling children of all abilities to excel, and more than that, we bring learning to life. Our support goes beyond a quick win in spelling or moving up a set in maths. Tackling such skills is important, but to enable children to really thrive in school and beyond, we focus on developing children's learning attitudes.

Explore Learning encourages children to take on new challenges and make the most of their talents. We individualise and tailor our tutoring for each child using a range of tools and techniques. Our core teaching tool is Compass, an Explore Learning-owned adaptive system that reflects our goals for our members in its design. We believe in positive reinforcement and use reward schemes to reward effort as well as achievements. We believe in the importance of creating confident and assertive young people as much as helping them with maths and English. This is very much our vision and ethos.

At the heart of our centres and communities are our brilliant people. We recruit passionate individuals who are great role models for children, fantastic communicators, and committed to getting it right for every child, every day. All our tutors and centre and community managers become experts in the school curriculum and current teaching methods. We recruit people who have a passion for education and a desire to make a real difference to children's lives.

Explore Learning has an Equal Opportunities policy. Every child and every member of staff is treated equally and with dignity irrespective of their age, culture, socio-economic background, ability, language, religious beliefs, racial origins, disability, sex, gender identity, sexual orientation, marriage or civil partnership status, pregnancy and/or maternity/ paternity. Our physical centres in England are registered on Ofsted's Voluntary Childcare Register, and we follow these registration requirements as a basis for self-assessment and provision improvement within all of our centres.

We seek parents'/guardians' and children's feedback from the moment they join us, to help us evaluate our care provision and the quality of tuition that we provide and make improvements that are important to them as individuals.

We aim to build a strong partnership with members' parents/guardians and work collaboratively with them to provide the best possible service and support each of our members to become fearless learners.

EQUAL OPPORTUNITIES POLICY

Explore Learning was founded to bring educational opportunities and benefits to as many children as possible. It is important to us that we serve a diverse mix of children and in particular:

- a balance of all genders
- a diversity of racial and cultural backgrounds
- children of all abilities
- disabled children, and those with special additional or special educational needs

We are uniquely able to achieve these goals because our method of working treats every child as an individual, and we operate with a high staff ratio. It is the job of our staff to ensure that the children feel welcomed, and that they all benefit from the service we offer. This includes a high level of individual attention, recognition, celebration of their successes and positive social interactions with staff and other children.

Explore Learning is committed to offering equal opportunities to both full-time and part-time employees irrespectiveof age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation providing they meet our recruitment selection criteria. This is detailed in more depthin our Centre Manager and Tutor Recruitment Policy.

In accordance with the Equality Act 2010, Explore Learning will:

- not unlawfully discriminate against anyone because of their protected characteristics
- consider how we support members with protected characteristics
- take positive action, where proportionate, to deal with the disadvantages these members face. For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

Explore Learning staff promote the fundamental British values of R.I.D.E: Rule of law, Individual liberty, Democracy, Equality - mutual respect and tolerance of those with different faiths and beliefs.

Actively promoting these values means challenging opinions or behaviours that are contrary to fundamental British values. Staff and children are encouraged to regard people of all faiths, races and cultures with respect and tolerance. It is expected that they should understand that while different people may hold different views about what is 'right'and 'wrong', all people living in the United Kingdom are subject to its law.

Explore Learning will:

- enable students to develop their self-knowledge, self-esteem and self-confidence;
- enable students to distinguish right from wrong and respect the civil and criminal law of the UK;
- encourage students to accept responsibility for their behaviour, show initiative, and to understand how theycan contribute positively to the lives of those living and working in the centre locality and wider society;
- encourage students to acquire a broad general knowledge of and respect for UK public institutions and services;
- encourage tolerance and harmony between different cultural traditions by enabling students to acquire an appreciation of and respect for their own and other cultures;
- encourage respect for other people; and
- encourage respect for democracy and support for participation in the democratic processes, including respect for the basis on which the law is made and applied in the UK.

We do not accept behaviour from children that causes harm to others and does not align with our values. When this occurs, we will play a role in educating children about any behaviours that have caused harm to others.
In the first instance, we believe in a restorative approach that helps a child understand their behaviour, impact and can lead to healing and change. This is outlined in a staff e-learning guide focused on how to respond to discrimination involving our members.

Diversity & Inclusion

Explore Learning is committed to providing a welcoming and inclusive place for our employees and children to thrive. It is assigned for all employees to complete our Diversity & Inclusion e-learning module which includes information on protected characteristics, bias and inclusive behaviours.

- We have a Diversity & Inclusion working group comprised of tutors, centre and community managers and Central Team staff.
- We have 5 staff network groups which provide a safe space for staff to support each other, shareexperiences and help us develop as a company.
- The group will help us to improve and evolve our policies as a company where appropriate.
- Our Diversity & Inclusion aims are summarised on our website, where our D&I Manifesto of goals and aimscan also be viewed. https://www.explorelearning.co.uk/diversity-inclusion/
- Whilst we do not have all the answers, we are committed to listening, learning, and helping to drive change.

DISABILITIES, SPECIAL EDUCATIONAL AND ADDITIONAL NEEDS POLICY

Explore Learning was founded to bring educational opportunities and benefits to as many children as possible, including disabled children, children with special additional and special educational needs.

Explore Learning treats all children with equal concern, as individuals, with diverse needs, likes and dislikes. Our service has a lot to offer all children, irrespective of ability. We tutor with a high staff to child ratio, between 1:1 and 1:6 which helps us take a child-centred approach.

We ensure that:

- We take time to discuss a child's needs with the parent/guardian and child as part of the registration and introduction process.
- We will take all reasonable steps to ensure all children have access to the provision.
- All children are welcomed as 'members' in the full sense of the word, irrespective of ability. Where we referto 'members' in our policies, we are referring to our students.
- We regularly review children's progress and adapt their programmes as necessary.
- We make the best possible use of progress meetings and other opportunities for dialogue and feedback.
- Parents/guardians are welcome to bring interpreters, translators, and educational psychologists to meetings at their own expense. The manager should be informed prior to the meeting, so they know who to expect. Explore Learning do not provide this service or cover the cost.
- Our staff are aware of disability issues, special educational and additional needs, and complete SEND trainingon developing inclusive practice.
- We are always open to guidance from parents/guardians and professionals on the type of training that maybe beneficial or necessary for working with a specific child.
- Support members with Care Plans, where necessary, to support with and understand a child's mental health or emotional needs.
- All parents/guardians and children with accessibility needs, if required, can access our centres straight away to ensure that they are free of any encumbrances in the centre.
- Staff will respect the privacy and dignity of all members and staff and ensure this is maintained whilst in our care.
- All confidential or sensitive information provided by a parent/guardian will remain confidential and only shared with the minimum necessary members of staff.
- All information provided will be stored securely in the child's personal file and on their individual record on our membership database. Our learning platform Compass is integrated with our membership system.
- We work within the guidelines of the Equality Act 2010, and for members in Northern Ireland, the Disability Discrimination Act 2005.

Membership Assessment

Explore Learning welcomes enquiries from all families and will always take time to properly understand a child's needs before making any decisions about membership.
We do not make decisions based solely on a diagnosis or label. Every child is assessed individually, because two children with the same diagnosis can have very different support needs and respond very differently to our setting.
In considering whether we can effectively support a child, we will assess:

- Whether we can communicate with the child verbally or non-verbally.
- Whether the child can access learning through our platform.
- Whether the child and everyone around them will be safe.
- Whether the child is likely to make meaningful progress within our setting.

Where we determine that our setting cannot meet a child's needs with reasonable adjustments, either at the point of enquiry or after a trial session we will communicate this honestly and with care.

Reasonable Adjustments

Explore Learning will make reasonable adjustments to remove or reduce barriers for children with SEND and their families. Examples of adjustments we may make include:

- Adjusting communication/instructions to meet a child's needs.
- Providing structured breaks or sensory support during sessions.
- Accessing support resources e.g. dyslexia font plugins, visual planners and wobble cushions.
- Allowing members to bring in tools they have at home to use in centre e.g. joystick mice.
- Discussing and agreeing individual support plans with families.
- Liaising with external professionals, such as SENCOs or educational psychologists where families provide relevant information.

All agreed adjustments will be recorded and shared with relevant staff. Adjustments will be reviewed regularly, at progress meetings as a minimum.

SEND Training for Staff

All Explore Learning staff complete SEND training as part of their induction and have access to resources on an ongoing basis.

SEND training covers:

- Understanding how to tailor to support children with SEND.
- Inclusive practice and reasonable adjustments within a tutoring context.
- Regulation, understanding what it is and how to support a child who is dysregulated using PACE.
- Where to find additional support information.
- Safeguarding considerations specific to children with SEND.

Safeguarding and SEND

Children with SEND may be at increased vulnerability to harm. Staff are trained to recognise that communication barriers, dependency on others, and social isolation can all increase risk, and that signs of abuse may present differently in children with SEND. This policy is read alongside our Safeguarding Policy and Safeguarding Procedures. In any situation where safeguarding and this policy intersect, the welfare of the child is paramount.

If a Family Has Concerns

If a family feels that their child has not been treated fairly, or that reasonable adjustments have not been made, we want to hear from them. In the first instance, families should speak to the Centre Director or Community Manager.
If the concern is not resolved, families can contact Explore Learning's Central Team at enquiries@explorelearning.co.uk. Our full Complaints Policy sets out the process for escalation.

Families also have the right to seek advice from external organisations such as their local SENDIAS service (Special Educational Needs and Disability Information Advice and Support) or IPSEA

SAFEGUARDING POLICY

These Safeguarding Policies and Procedures have been written in consideration of and will be applied in conjunction with:

- NSPCC guidance
- Safeguarding Partnership Arrangements
- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguarding Children 2026
- Keeping children safe in out of school settings (2026)
- The Children Act 1989 and 2004
- The Children and Social Work Act 2017
- The Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Prevent Duty Guidance: for England and Wales (2023)
- Disqualification under the Childcare Act 2006
- Domestic Abuse Act 2021
- Channel Duty Guidance: Protecting people susceptible to radicalisation (2023)
- Multi-agency statutory guidance on FGM (July 2020)
- What to do if you're worried a child is being abused: advice for practitioners (2015)
- Information sharing: advice for practitioners providing safeguarding services (2026)

1. Purpose of regulation: To inform parents/guardians of Explore Learning's policies and responsibilities concerning safeguarding and to stress the importance of communication.

2. Purpose of regulation: To inform staff of their responsibilities when working with children.

Explore Learning recognises that owing to their day-to-day contact with children, staff are well placed to observe the outward signs of abuse. The setting will therefore:

- Establish and maintain an environment where children feel secure, encouraged to talk, and are listened to.
- Ensure children know that there are adults whom they can approach if they are worried.

Explore Learning recognises that children who are abused, witness violence, exploited, or neglected, may not recognise their experiences as harmful, and/or may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. They may not feel ready or know how to tell someone that they are being abused. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the Designated Safeguarding Lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

The Explore Learning environment may be the only stable, secure and predictable element in the lives of children at risk. During a session, their behaviour may be challenging and defiant, or they may be withdrawn. The setting will endeavour to support the member through:

- an ethos which promotes a positive, supportive, secure environment, giving members a sense of feeling valued.
- a behaviour policy which is aimed at supporting vulnerable members attending sessions. The staff will ensure that the member knows that some behaviour is unacceptable, but they are valued and not to beblamed for any abuse which has occurred.
- Liaison with other agencies that support the member such as Children's Social Care, Education Welfare Services and Educational Psychology Services.

INTRODUCTION

A child is defined as a person under the age of 18 (The Children Act 1989).

In England a child is defined as anyone who has not yet reached their 18th birthday. Child protection guidance points out that even if a child has reached 16 years of age and is: living independently, in further education, a member of the armed forces, in hospital; or in custody in the secure estate; they are still legally children and should be given the same protection and entitlements as any other child.

Northern Ireland

In Northern Ireland The Children (Northern Ireland) Order 1995 defines a 'child' as a person under the age of 18.

Scotland

In Scotland, the definition of a child varies in different legal contexts, but statutory guidance which supports the Children and Young People (Scotland) Act 2014, includes all children and young people up to the age of 18.
Where a young person between the age of 16 and 18 requires support and protection, services will need to consider which legal framework best fits each persons' needs and circumstances. The National guidance for child protection in Scotland gives more detail about this and explains how professionals should act to protect young people from harm in different circumstances (Scottish Government, 2021).

Wales

Section 3 of the Social Services and Well-being (Wales) Act 2014 states that a child is a person who is aged under 18.

For the purpose of this policy document:

- The term 'child' will be used to describe all children and young people under the age of 18 years old participating as a member at Explore Learning (i.e. any of our students).
- The term 'staff' will be used to describe those employed on a contract of employment at Explore Learning,as well as those working on a voluntary or temporary basis.
- Staff must follow this policy at all times. This will protect the safety and wellbeing of children engaging withExplore Learning and that of our own staff.
- For all activity and events involving children at Explore Learning, at least one member of staff will lead on safeguarding, raising awareness of this policy and its guidelines among other staff and, where appropriate children and parents/guardians.
- Where staff engage with children, that member of staff will have received appropriate training in safeguarding.

Children's Rights

All children have needs and rights:

- The need for physical care and attention
- The need for intellectual stimulation
- The need for emotional love and security
- The need for social contact and relationships
- The right to have their needs met and satisfied
- The right to be protected from neglect, abuse and exploitation
- The right to be protected from discrimination
- The right to be treated as an individual

The UN Convention on the Rights of the Child (UNCRC) sets out the rights of every child in the world to:

- survive
- grow
- participate
- fulfil their potential

It sets standards for education, health care, social services and penal laws, and establishes the right of children to have a say in decisions that affect them. (Office of the United Nations High Commissioner for Human Rights (OHCHR), 1989). Children's rights must be respected and protected online as well as offline (OHCHR, 2021). The UK signed this convention in 1990. The Rights of Children and Young Persons (Wales) Measure 2011 ensures that children's rights are included in all legislation and policy making in Wales (Welsh Government, 2019).

Being subjected to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights Act.

The United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024, incorporates the UNCRC into Scottish law. This means that public authorities across Scotland have to comply with children's rights in all the work they do (Scottish Parliament, 2024).

What is Safeguarding?

In accordance with KCSIE and Working Together to Safeguard Children, safeguarding and promoting the welfare of children, is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment; whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children; and
- taking action to enable all children to have the best outcomes, set out in the Children's Social Care National Framework.

In addition, the Children Act 1989 sets out six key principles in safeguarding:

1. Paramount – the child's welfare is paramount
2. Parental Responsibility – parents have a duty of care for their child and meet their needs
3. Partnership – professionals and families are to work together for the welfare of children
4. Participation – children's wishes, and feelings should be ascertained so that they can contribute appropriately
5. Prevention and provision of Services – services may be necessary to safeguard and promote the welfare of a 'child in need'.
6. Protection – a child must be protected from serious harm. The Local Authority has a duty to investigate any reportthat a child is suffering, or likely to suffer, 'significant harm'

How children's concerns and expressions of need are perceived and responded to

Staff must appreciate that children communicate their worries and concerns in a multitude of ways. In fact, direct verbal expression is less likely than, e.g. behaviour changes or activity giving cause for concern - perhaps a piece of writing which gives rise to some thought of "inappropriate" activity or knowledge beyond a child's years, flinching when a hand or arm is raised innocently as if scared of being struck, unusual depression, social withdrawal, unexplained bruising, burns, injuries etc.

Above all, children and young people who are in need or trouble always deserve and need someone:

- Who will listen
- Who will not make judgements
- Who will not make false promises about keeping a secret when that is not possible
- Who will not reject what they are saying as untrue

A troubled child or young person will need to be reassured that their needs are being put first, and they are the priority above other concerns." The staff member is in a unique position in terms of sympathetic environment andof trust.

Suitability and Nature of Physical Environment

The layout of the activity, premises and physical/online environments have been considered in terms of a child's safety, including from a safeguarding viewpoint. A Risk Assessment is conducted annually in consideration of physical risks, as well as a dailycheck to maintain standards and security within the setting.

Explore Learning Safeguarding Policy

In our provision for children, Explore Learning will ensure that:

- The welfare of the child is paramount
- All children, whatever their age, culture, socio-economic background, ability, language, religious beliefs,racial origins, disability, gender and/or sexual identity have the right to protection from abuse, neglect or exploitation.
- All suspicions and allegations of abuse, neglect or exploitation will be taken seriously and responded to swiftly and appropriately.
- All staff have an inescapable responsibility to protect children from harm and to report concerns to the appropriate safeguarding lead member of staff ASAP.

Policy Statement

Explore Learning staff have a professional duty to take all necessary steps to see that the child is safe from harm whilst involved in Explore Learning activities. All children have a right to protection, and the needs of disabled children and others who may be more vulnerable must be considered. Explore Learning will ensure the safety and protection of all children involved in its activities through adherence to this Safeguarding Policy and the Safeguarding Procedures.

Policy Aims

The aim of the Explore Learning Safeguarding Policy is to set the standard necessary to:

- Provide children and young people with appropriate safety and protection whilst in our care.
- Allow all staff to make informed and confident responses to specific safeguarding issues.
- Identify and prevent safeguarding issues.

Policy Implementation

The Explore Learning Safeguarding Policy will be implemented by adhering to the policy guidelines within this document. All staff who work with children directly or indirectly must adhere to this policy.

The guidelines cover four main areas:

- Staff recruitment, support and training
- Staff conduct
- E-security
- Safeguarding procedures

The Safeguarding Team

In physical centres, Tutors are organised into centres with one or more managers. The Centre Director is the safeguarding lead for their centre. In their absence the Assistant Director or On Call supervisor on duty is trained to respond to safeguarding concerns and will ensure they are handled according to company policies and procedures and escalated to the Centre Director on their return.

For our online communities, we have a centralised Tutor management team who work closely with Community Managers. The Community Managers are the designated safeguarding leads for their online community. In their

absence an On Call supervisor on duty is trained to respond to safeguarding concerns and will ensure they are handled according to company policies and procedures and escalated to a Community Manager on their return.

Explore Learning has an appointed Senior Designated Safeguarding Officer (SDSO) Kate Turner, whose main responsibility is to support the safeguarding leads with any concerns and with making referrals where necessary.Explore Learning also has a Deputy Designated Safeguarding Officer (DDSO), should the SDSO be unavailable. Allstaff are informed of the identities of their safeguarding lead, the SDSO and the DDSO in their induction safeguarding training and on the company intranet.

Centre and Community Safeguarding Leads, with the support of the SDSO/DDSO

Referrals: each centre or community's designated safeguarding lead is expected to refer cases:

- of suspected abuse, neglect or exploitation to the local authority children's social care as required and support staff whomake referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and where a crime may have been committed to the Police as required.

Work with others: the designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all of their centre or community staff;
- act as a point of contact with the safeguarding partners;
- liaise with the SDSO/DDSO to inform them of issues - especially ongoing enquiries under section 47 of the Children Act1989 and police investigations;
- as required, liaise with the "case manager" and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff on matters of safety and safeguarding and welfare (including online and digital safety) and whendeciding whether to make a referral, by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the SDSO/DDSO where safeguarding concerns are linked to mental health; and create Care Plans or Child Risk Assessments where appropriate to support the child and understand their needs.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the SDSO/DDSO and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagementand achievement. This includes:
    - ensure that they know who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations forthis cohort; and,
    - support tutors to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing:

- Each centre or community safeguarding lead is responsible for ensuring that child safeguarding records are kept up to date, including: Incident Reports, Care Plans, Parental Responsibility and Access Care Plans, Intimate Care Plans and Child Risk Assessments. Records should include the rationale for any decisions made.
- When deciding what information to share, managers should consider the relevancy of the information, what the receiving setting needs to know and whether the information is clearly presented and suitably contextualized Staff should use professional judgement to make sure that any information shared is focused and proportionate
- Where a member is changing settings and information indicates a risk to others and/or the individual pupil, the receiving setting is responsible for assessing risk and putting a safety and support plan in place; the DSLs from both settings should have a conversation where there are concerns.

Raising Awareness: the designated safeguarding lead should:

- ensure centre or community's staff have access to, and understand, Explore Learning's safeguarding policy and procedures;
- link with their local Safeguarding Partner Arrangements to make sure staff are aware of any training opportunities andthe latest local policies on local safeguarding arrangements; and,
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with tutors.

Providing support to staff: each centre or community's safeguarding lead will

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children: each centre or community's safeguarding lead must:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures Explore Learning may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information: each centre or community's safeguarding lead must:

- understand the importance of information sharing and record keeping;
- understand relevant data protection legislation and regulations; and
- keep detailed, accurate, secure written records of concerns and referrals, including the rationale for any decisions made.

The SDSO and DDSO:

The SDSO and DDSO form Explore's Safeguarding Team to provide support to each centre or community's safeguarding lead inrelation to any concerns they may have. They are also available to assist with making referrals, although responsibility for making those referrals lies with the centre or community safeguarding lead. In addition, the SDSO/DDSO run a safeguarding helpline through which they provide advice and guidance.

The SDSO will also:

- ensure the safeguarding policies and training are reviewed annually as a minimum and the procedures and implementation are updated and reviewed regularly;
- Ensure the safeguarding policies are available publicly and that parents/guardians are aware of the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the organisation in this;
- During service hours, the SDSO or DDSO should always be available to staff to discuss any safeguardingconcerns via the Safeguarding Helpline number.

<u>Staff Recruitment, Support and Training</u>

For staff working with children at Explore Learning, safe recruitment will be ensured by checking their suitability to work with children, including:

1. Suitability questions at interview stage
2. All staff complete a suitability self-declaration.
3. A suitable Enhanced DBS/PVG/NI Access check every five years
4. A check of the children's barred list.
5. Two dated references requesting details of their previous experience and suitability to work withchildren. Where available, one must be from their most recent employer.
6. A record of staff's declared current and history of physical and mental health.
7. A declaration as to whether they are disqualified from childcare (where applicable).

<u>Staff Training</u>

Explore Learning believes that training and raising awareness of safeguarding is fundamental to the developmentand maintenance of a safer environment, safer organisation and safer staff. Explore Learning will ensure that appropriate safeguarding training is provided to all staff, covering:

1. Induction training in Health and Safety, Fire Safety, Safeguarding including Online Safeguarding, Behaviour Management, and the 'Common Core Skills and Knowledge of the Children's Workforce'. As part of this induction training, all new staff are provided with the identity of each centre or community's safeguarding lead, the Senior Designated Safeguarding Officer (SDSO) and the Deputy Designated Safeguarding Officer (DDSO).
2. All staff to confirm the have read and answered questions about Explore Learning's annual Policy &Procedures review on their training account.
3. Safeguarding training modules are refreshed annually and recorded centrally on the company staff training platform.
4. Safeguarding training covers the four main types of abuse Physical, Emotionally, Neglect and Sexual (PENS) as well as domestic violence, county lines, sexual exploitation, child on child, FGM and radicalisation.
5. Training on Neglect covers: Physical, Emotional, Educational and Medical (PEEM)
6. Safeguarding training covers: Preventing, Recognising, Responding, Recording and Referring concerns about abuse, neglect or exploitation.
7. Awareness of The Prevent Duty, recognising the signs and symptoms that a child may be at risk from radicalisation, how to protect children from terrorism or extremism, and where to report concerns.
8. Awareness of Female Genital Mutilation (FGM) to cover an understanding of key issues, risk factors, high risk absences, symptoms, long term health problems, legislation and how to share information to ensure a person at risk of FGM is referred to the appropriate support and that known incidents of FGM are reported to the police.
9. Awareness of safeguarding issues will continue to be addressed through on-going training, guides and workshops.

The company SDOS and DDSO have undertaken Advanced Safeguarding Training, Role of DSO, The Prevent Duty awareness training, Managing Allegations, Online Safety, and are able to provide advice and support to other members of staff on protecting children from the risk of abuse, neglect, exploitation or radicalisation. Their DSO training is refreshed every two years, with continual professional development in between.

<u>Staff Conduct</u>

All staff should demonstrate exemplary behaviour in adherence to the Codes of Conduct and all Policies and Procedures in order to protect members and colleagues, and protect themselves from allegations of misconduct. Staff should maintain their standards of behaviour, therefore acting as a role model. The following are common sense examples of how to create a positive culture and climate for learning.

What does good practice look like?

Within Explore Learning Physical Centres

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets). Never allow yourself to be left alone with a member. There may be rare occasions when a confidential one-to-one meeting is necessary and, in such circumstances, the meeting shouldbe conducted in a room with an open door or visual access. Where this is not possible, the member of staff should ensure that there is another adult nearby.
- Maintaining a safe and appropriate distance from children, and avoiding all physical contact with children at all times. Do not pick them up, allow cuddles or allow children to siton your lap etc. There may be occasions where a distressed member needs comfort which may include physicalcomforting; staff should use their discretion to ensure that it is appropriate and not unnecessary or unjustifiedcontact.
- Never use the threat of or actual physical punishment or force against a member, unless it constitutes reasonable restraint to protect them, another person, or to protect property. Refer to 'Physical Restraint Policy' for more guidance.
- Stopping and questioning any unknown or unsupervised adult who enters the premises and/or who attempts to engage with children. Any person, other than employees, are only permitted entry for a meeting with

Explore Learning staff and must never be left unsupervised or have access to the Explore Learning computers or network.

In Centre and Online through Explore at Home

- Treat all children equally, and with respect and dignity. Explore Learning will take positive action to eliminate discrimination against any person or group of people. Staff should ensure that children are protected from unlawful discrimination on any grounds, including ability and challenge discriminating comments and behaviour. Staff should promote positive attitudes towards diversity.
- Build balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Provide enthusiastic and constructive feedback.

Practices never to be sanctioned (where relevant to the setting):

- Tutors under 17 must be under supervision at all times and are therefore not permitted to Tutor online.
- Engaging in any form of inappropriate touching, including pinching, slapping or horseplay.
- Allowing safeguarding disclosures made by a child to not be discussed, unrecorded or not acted upon.
- Discussing inappropriate topics including subjects such as relationships, sexual activity or illegal activities. Staff should notify parents/guardians of any inappropriate topics raised by the child. Conversations should be solely about their session or welfare.
- Contacting a child outside an authorised session can put staff and children at risk of safeguarding allegations such as grooming or inappropriate behaviour, no matter how innocent the intention. Staff should protect themselves and children, both during and after their employment with Explore Learning, by never:
    - Sharing personal contact details including: phone numbers, email or home addresses or social media links/pages; nor accepting those provided by a family
    - Contacting a child by text, WhatsApp, email or through any social media channel/platform
    - Arranging to meet a child outside of an authorised session in person or online whether professionally or socially.
    - Staff are advised to notify Managers of any attempt made by a child/family to request/share details outside of authorised sessions.
- Taking a voice or video recording for any purpose without written permission from parent/guardian before recording commences, using Explore Learning's online permission form.
- Doing things of a personal nature for children or disabled adults that they can do for themselves. It may be sometimes necessary for staff to do things of a personal nature for children, particularly if they are young or disabled. These tasks should be carried out with the full understanding and consent of the parents/guardians. There is a need to be responsive to a person's reactions. If a person is fully dependant on you, talk with them about what you are doing and give choices where possible – particularly if you are involved in dressing or undressing of outer clothing, or where there is physical contact, lifting, or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks which you are not appropriately trained.

<u>Use of photographic/filming equipment/recording of sessions</u>

If Explore Learning wishes to use an image or recording of a member, written consent will be obtained in advance from parents/guardians via an online form. They have the right to refuse consent.

Parents/guardians will be made aware of when, where and how the images may be used and how long they will be kept in order to give their informed consent. This includes information regarding use of images e.g. in print, multimedia, broadcast; for what purpose e.g. promotion, publicity, evaluation, audit, review; and where possible an indication of who the audience will be e.g. the general public, the participating children and their families, other organisations and institutions.

Explore Learning will never disclose the full name or other personal details of the child without the parent/guardian's separate written consent. Where a child is deemed to have capacity to understand their own data rights, their view will also be considered where they object to the use of an image or a recording.

Members and parents/guardians are not permitted to make any recordings, such as photographs or videos on any device unless a Manager has granted permission and ensures no other children or information about other members is visible.

Use of Mobile Phones and Smart Watches (use by staff covered in Code of Conduct)

Children and visitors are not permitted to use any personal electronic device within the centre or during online sessions unless under supervision, in an emergency, or to communicate a child's safety, such as if they arrived or intend to leave alone.

E-security

The internet and social media expose children to potentially harmful and inappropriate material. KCSIE identifies four key areas of online risk:

1. **content**
2. **contact**
3. **conduct**
4. **commercialisation**

Many children have unlimited and unrestricted access to the internet via mobile phone networks. This means some children sexually harass their other children via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

Staff will be trained in online safety, and the theme of online safety will be an integrated theme in the way Explore Learning operates and in our policies. Staff have a duty to escalate any concerns or suspicions relating to members being exposed to potentially harmful or inappropriate online material or online abuse.

Technology, and the risks and harms related to it, evolve and change rapidly. Explore Learning will therefore carry outan annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks facing our members.

Within Explore Learning Centres

Children have supervised access to computers throughout the centre. Strict controls are placed on access to websites. Explore Learning controls internet breakout through a geo-redundant virtual Fortinet firewall, which applies defined profiles to prevent access to unsuitable sites, images or content. The firewall is automatically updated and patched to ensure the network is secured against new and changing threats.

When Tutoring Online via Explore at Home

If staff are using a personal device for company purposes, they must ensure that they are using a supported version of Windows 11 or macOS, and apply security updates as soon as they are made available. Devices must rely on the built-in endpoint protection provided by Windows Defender or macOS.
If a member of staff leaves the organisation, access to all company linked tools are revoked from the device prior to leaving their role.

No sensitive company data is stored locally on personal devices.

No images or recordings of children are permitted to be taken or stored on any personal device. Staff are required to comply with the Online Learning Policy.

SAFEGUARDING MEASURES

Explore Learning follows the procedures set out by local multi-agency Safeguarding Partnership Arrangements and

takes account of guidance issued by the Department for Education and Skills to ensure:

1. Explore Learning holds the full name, date of birth and home address for every child, and the full name, contact number and home address for parents/guardians. This information will be kept securely and confidentially in accordance with our Privacy Policy.
2. Children's session times for both in centre and online are recorded. For physical centres, children are electronically signed in and out on arrival and departure, which is recorded on our company membership database.
3. All staff, visitors, parents/guardians who step through the centre gate must sign in and out with their full name and the time, so everyone is accounted for at all times for both fire and safeguarding regulations. Records must be written in pen for permanency.
4. Centre Visitors, including parents/guardians, must always be supervised by fully trained and vetted staff
5. Staff with a criminal conviction or pending criminal investigation, in relation to children or any sexual offence,will not be allowed to work, or granted access to the centre.
6. The Centre Director of each centre / Community Manager and Lead of each online community has received appropriate training and support to take on the role as Designated Safeguarding Lead for their members, family and staff team, with the support of the Senior Designated Safeguarding Officer. The Head of Ofsted & Safeguarding, Kate Turner is the nominated Senior Designated Safeguarding Officer.
7. Every member of staff (including temporary) know the names and roles of the staff responsible for safeguarding.
8. All staff understand their responsibilities in being alert to the signs and symptoms of abuse, neglect or exploitation, and for referring anyconcerns to the designated senior person responsible for safeguarding.
9. Parents/guardians understand the responsibility placed on the setting and staff for safeguarding, by setting out its obligations in the setting's Policies & Procedures.
10. Explore Learning Staff develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters, including attendance at case conferences.
11. Staff keep written records of concerns about children, even where there is no need to refer the matter externally.
12. Staff always follow procedures where an allegation is made against a member of staff, as set out in the Managing Allegations Against Members of Staff policy.
13. All safeguarding incidents are reported centrally to the company's central Safeguarding Team, to be recorded on the Company's Central Incident Record file.
14. Safer recruitment practices are followed.

Safeguarding Quality Assurance and Review

Explore Learning is committed to striving for excellence in the provision of all of its services. The Senior Designated Safeguarding Officer actively reviews how all safeguarding concerns are managed all year round and provides a summary of serious cases to the Senior Leadership Team on a monthly basis. Any serious cases, such as staff allegations involving LADO or safeguarding allegations occurring on Explore Learning premises, and incidents reportable to Ofsted are reported immediately.

Explore Learning use electronic incident records which are saved centrally within a secure One Drive Compliance folder to capture all relevant data that supports the evidence and monitoring of compliance in safeguarding.This quality assurance mechanism is a crucial and integral part of the governance structure.

The Senior Designated Safeguarding Officer and Senior Leadership Team review the safeguarding policy and supporting procedures annually in August to ensure they continue to reflect legislation and guidance.

GDPR and Safeguarding

The GDPR explicitly states that children's personal data merits specific protection. It also introduces new requirements for the online processing of a child's personal data.

Children have the same rights as adults over their personal data. These include the right to:

- be provided with a transparent and clear privacy notice which explains how their data will be processed
- be given a copy of their personal data
- have inaccurate personal data rectified and incomplete data completed
- exercise the right to have personal data erased if they wish.

A child may exercise these rights on their own behalf as long as they are competent to do so.
In Scotland, a person aged 12 or over is presumed to be of sufficient age and maturity to be able to exercise their data protection rights. In England and Wales and Northern Ireland, competence is assessed depending upon the level of understanding of the child. Even if a child is too young to understand the implications of their rights, they are still their rights, rather than anyone else's such as a parent or guardian.

The provisions of GDPR help children to keep themselves safe online by giving them more control over the informationthey share. GDPR gives children the 'right to erasure'. This means they can request online platforms to remove theirpersonal data, including pictures, text or status updates.

If a child has shared any material online that they no longer wish anyone to see, they have a legal right to get this material removed, even if the content was posted by someone else.

Under this law, children must be at least 13 years old to provide consent for an information society service (ISS) to process their personal data. Parents must provide consent if the child is under 13. An ISS is an online service that is typically commercial and provided on request, for example social media platforms, apps, connected toys and devices, and search engines.

GDPR emphasises the importance of asking children for consent before sharing personal information.

If a child is mature enough you should give them the opportunity to decide whether they agree to their confidential information being shared. If a child doesn't have the capacity to make their own decisions, you should ask their parent or carer (unless this would put the child at risk). However, if you have a child protection concern, you must share information with the relevant agencies, even if you haven’t been given consent. Fears about data processing must **never** stand in the way of escalating concerns or making reports.

Explore LEARNING

SAFEGUARDING PROCEDURES

What is abuse?

CHILD ABUSE: A term to describe maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial context by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

CHILD ABUSE IS PHYSICAL INJURY, EMOTIONAL, NEGLECT OR SEXUAL ABUSE (PENS) inflicted or knowingly not prevented, which causes harm. It can happen over a period of time, but can also be a one-off action. It can happen in person or online.

All staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can becovered by one definition or label. In most cases, multiple issues will overlap with one another.

Awareness of actual or likely occurrence of abuse

There are several ways in which abuse can become apparent:

- A child discloses abuse.
- A child's behaviour may indicate that it is likely they are being abused.
- Someone else discloses that a child has told them, or they strongly believe a child has been or is being abused.
- A child may show signs of physical injury for which there appears to be no satisfactory explanation.
- A member of staff's behaviour or in the way in which they relate to a child, causes concern.
- A staff member may witness or hear an instance of abuse.
- Receipt of an anonymous allegation.

Becoming aware of abuse can cause a multitude of emotional reactions, which are personal to each individual. Whatever the reaction and however the abuse has become apparent, actual or suspected, it must always, without exception, be reported in the correct manner according to the procedure outlined in this document. Even if the truth of the disclosure is uncertain, and appropriate investigation and response must be formulated, in accordance with the procedure outlined here.

Physical Abuse

Physical abuse is the causing of physical harm. It can lead directly to neurological damage, physical injury and disability. Some physical abuse is reactive; some may be premeditated with the intent to cause harm. Types of abuse include: hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, but may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that a child has been physically abused include: bruises, abrasions, burns, scalds, bite marks, fractures and scars.

Signs which may be indicators of concern include:

- Explanations provided for an injury which may not be consistent with the injury.
- Parents/Carers undisturbed or uninterested in an accident or injury.
- Unexplained delay in seeking treatment for an injury.
- Repeated presentation for minor injuries, which may represent a cry for help.
- Reluctance to give information or mention previous injuries.

- Children who flinch at sudden movements.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It has an important impact on a developing child's mental health, behaviour and self-esteem.

Types of emotional abuse include:

- Conveying to a child that they are worthless, unloved, inadequate or valued only insofar as they meet the needsof another person.
- Not allowing a child to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Persistently criticising, teasing or humiliating a child.
- Imposing developmentally inappropriate expectations, such as interactions beyond a child's developmental capabilities, overprotection, limiting exploration or preventing normal social interaction.
- Causing a child to feel frightened or in danger.
- Exploitation or corruption of children.
- Allowing a child to see or hear the ill-treatment of another.
- Bullying or cyberbullying.

Signs of emotional abuse may be difficult to recognise as they are mainly behavioural. From the parent/guardian to childrelationship perspective they include:

- Abnormal attachment between the child and their parent/guardian
- Parents/guardians who frequently complain about their child, who never praise or give attention or who are emotionallydistant from their child.

From the child's perspective, they include:

- Failure to thrive.
- Behavioural problems such as aggression or attention-seeking.
- Low self-esteem, lack of confidence and fearfulness, distress or anxiety.
- Poor relationships such as withdrawn or isolated behaviour.
- Delay in achieving developmental milestones.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse

Sexual abuse is forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Children can be sexually abused within the family, an institution or a community setting and often know the person carrying out the abuse. The activities may involve:

- Physical contact, including assault by penetration (e.g. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching through clothing.

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways.

- Grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males; women can commit acts of sexual abuse, as can otherchildren.

Child sex abusers come from any professional, racial or religious background. Children under 16 years of age cannot provide lawful consent to any sexual intercourse.

Recognition of sexual abuse is difficult unless the child chooses to disclose and is believed, but signs are likely to be behavioural and emotional. There may be:

- Sexually explicit conversation or behaviour inappropriate to the child's age.

- Self-harm, including eating disorders and self-mutilation.

- Suicide attempts.

- Running away.

- Poor peer relationships, including unwillingness to be involved or communicate.

- Sudden changes in behaviours or extreme mood swings.

- Withdrawal and/or depression.

- Inappropriately sexualised conduct.

Neglect

Neglect is the persistent failure to meet basic physical, emotional and/or psychological needs and is likely to result in the serious impairment of the child's health or development and long-term difficulties with social functioning, relationships and educational progress.
Types of neglect include failure to:

- Provide adequate food, clothing and shelter.

- Protect a child from physical and emotional harm or danger or ensure adequate supervision.

- Ensure access to appropriate medical care or treatment.

- Respond to a child's basic emotional needs.

Signs of general neglect include a child who:

- Is unkempt or inadequately clothed.

- Is listless, apathetic or unresponsive.

- Frequently and/or inexplicably attends hungry.

- Has frequent accidents or injuries.

- Thrives away from the home environment, but not in it.

Specific Safeguarding Issues

Abusive behaviours can be displayed in a variety of ways and can consist of sexual abuse/activity; physical harm; emotional and/or verbal abuse. Additionally, behaviours linked to the likes of drug taking, alcohol abuse, truantingand the sending of nude and semi-nude images put children in danger. Abusive behaviours can occur both inside and outside of school, or online.

Explore Learning acknowledges the following as specific safeguarding issues:

- bullying including cyberbullying
- children involved in the court system
- children missing education
- children missing from home or care
- children with family members in prison
- child criminal exploitation
- child sexual exploitation
- county lines
- modern slavery
- cybercrime
- domestic abuse
- homelessness
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence / violence against women and girls (VAWG)
- hate
- homelessness
- so called 'honour-based' violence
- mental health
- child on child abuse (including sexual harassment and sexual violence between children)
- private fostering
- radicalisation
- relationship abuse
- sharing of nude and semi-nude images and/or videos (with or without consent)
- trafficking
- upskirting
- sextortion

Staff should be mindful that safeguarding incidents and/or behaviours can be associated with factors outside the learning environment. This is known as Contextual Safeguarding, which recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. This means that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Online Safeguarding

Staying safe online includes a wide range of issues. Staff should have good general understanding of the different risks young people can face online. The 4 main risk areas are:

1. **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny/misandry, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
2. **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
3. **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
4. **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Staff should be able to hold positive, supportive conversations about online safety with young people when appropriate.

Child on Child Abuse (including child on child sexual harassment and sexual violence):

All staff should be aware that safeguarding issues can manifest via child-on-child abuse, and the different forms child-on-child abuse can take such as:

• bullying (including cyberbullying, prejudice-based and discriminatory bullying),

• discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,

• abuse in intimate personal relationships between children (also known as teenage relationship abuse),

• physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,

• physical assault and harm, or the threat of harm with a weapon,

• harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.

• consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI.

• causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,

• upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and initiation/hazing type violence and rituals.

• initiation/hazing type violence and rituals (e.g. member's being subject to initiation type activities),

• inappropriate behaviour by an older member towards a younger or more vulnerable member

We do not tolerate child on child abuse and staff must never pass it off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.

Any reports of child-on-child abuse will always be taken seriously, and is a safeguarding issue for all children involved. Staff should recognise the impact it has on a child's wellbeing and it should be considered within safeguarding practice where appropriate.

Child on child abuse can happen both inside and outside of schools, in our centres or online. The time of highest risk is immediately after school. It is of the utmost importance that staff are able to recognise the early indicators and behaviours of child-on-child abuse, and that they understand how to respond to reports. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be

the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Child on child sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or a group of children. It is never acceptable. We adopt an attitude of "it could happen here" in relation to sexual violence and sexual harassment. In every possible instance we will seek to address inappropriate behaviour (even if it appears relatively innocuous) before it becomes problematic, abusive and/or violent in the future. All staff have a role to play in proactively being alert to instances of potential child on child sexual violence or sexual harassment.

Sexual violence includes:

- Rape
- Assault by penetration
- Sexual assault
- Causing someone to engage in sexual activity without consent

Sexual harassment includes:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes andappearance and calling someone sexualised names
- Sexual "jokes" or taunting
- Physical behaviour, such as, deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- Online sexual harassment. This may be standalone, or part or a wider pattern or sexual harassment and/or sexualviolence. It may include:
- Consensual and non-consensual sharing or nude and semi-nude images and/or videos
- Sharing of unwanted explicit content
- Upskirting
- Sexualised online bullying
- Unwanted sexual comments and messages, including on social media
- Sexual exploitation, coercion and threats
- Sextortion

Sexual harassment creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

If students wish to report child on child abuse, they may make that report to any member of staff, and that that member of staff will take their report seriously, and that they will never be made to feel like they are creating a problem by making the report.

If staff become aware of a child-on-child incident or any member behaviour that gives rise to a safeguarding concern, they must report it to the safeguarding lead in accordance with the procedures set out in this policy. All victims will be reassured that they are being taken seriously, and no victim will ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

All staff will be trained in how to make a report. This will include the importance of not promising confidentiality at the initial stage and the need to listen carefully to the child whilst not being judgmental. Ideally, two staff members will be present (although this will not always be possible) and clear notes will be taken (best practice is to wait until the end of the disclosure and then write up notes immediately).

Where nude or semi-nude images or videos are involved, it always requires a safeguarding response, whether they are consensual or non consensual. Staff should take a proportionate approach that considers the age, development and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability. Staff must avoid viewing images wherever possible and make sure they are not forwarded on to others. Taking, making, sharing and possessing indecent images and pseudo-photographs of people under 18 is illegal. https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
We understand that any child who is engaging in abusive behaviour towards others may have been subject to abuse

from other children or from adults. Where an allegation is made against a member, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will befollowed. Appropriate support will be provided to all members involved, including support from external services as necessary. All allegations will be recorded.

Careful consideration will be given to the appropriate response to any report of child-on-child sexual violence and/or sexual harassment. This will involve a risk and needs assessment and take into account the nature of the alleged incident (including whether a crime may have been committed), the ages of the children involved, any power imbalance between the children, whether the incident is a one-off or sustained pattern, intra familial harms and support for siblings, the on-going risks present and other related issues and the wider context. Special consideration will be given to the appropriateness of separating the perpetrator and victim from any tutoring sessions they share.The needs and wishes of the victim will be considered paramount and the victim will be at the heart of our response.We will seek to allow the victim to continue in their normal routine, as far as possible, ensuring that our centres, and online sessions are all a safe space for them. We will consider whether any medical, practical or emotional care isneeded by the victim. We have a strong commitment to its anti-bullying and will consider all coercive acts and inappropriate child behaviour within a child protection context. We will take will the appropriate action to ensure the safety and welfare of all members involved, including the member or members accused of abuse. This may include:

- Managing the incident internally
- Early Help
- Referral to Children's Social Care
- Reporting to the Police

Victims may not disclose the whole picture immediately and children who have been victims of sexual violence or sexual harassment may be traumatised and struggle in a normal classroom environment. Perpetrators may also needsupport. We will be alert to the need for on-going safeguarding vigilance and support for both victim and perpetratorin all cases of child-on-child abuse.

If a report is shown to be deliberately invented or malicious, Explore Learning will consider whether any disciplinary action is appropriate against the individual who made it.

Staff must understand that a lack of reporting of child-on-child abuse does not mean that it is not happening. It may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding child-on-child abuse, they must report it to their safeguarding lead, even when the child about whom they are concerned has not made a report.

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Children questioning their gender

A child questioning their gender is not, in itself, a safeguarding concern. Children should be treated with dignity and respect and given space to talk without staff making assumptions or attempting to influence them. Relevant information and support needs should be recorded within the child's Care Plan.

Where a child asks Explore Learning to make changes associated with social transition, such as using a different name or pronouns, individual members of staff should not agree significant changes independently. Parents/carers should ordinarily be involved, with the child's wishes, wellbeing and individual circumstances considered.

Staff should not promise confidentiality or automatically share information where doing so could place the child at risk of harm. Where there is disagreement between a child and their parent/carer, or uncertainty about the appropriate response, advice should be sought from the Safeguarding Team.

Any associated safeguarding or welfare concerns should be managed in line with Explore Learning's usual safeguarding

procedures. Further information, including our decision-making process and sources of external support, can be found on the Explore Learning Safeguarding intranet pages.

Children absent or missing from education:

A child being absent or going missing from school education through unexplainable and/or persistent absences from education can be a warning sign of a range of safeguarding concerns; including: sexual abuse, sexual exploitation or child criminal exploitation. Staff should follow up on member absences, whether they are absences from in centre sessions or online sessions.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):

CSE and CCE occur where a child is coerced, manipulated or deceived into taking part in sexual or criminal activity.

CSE is a form of sexual abuse, where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. This type of harm can be committed or facilitated by an organised network or gang and children may identify as part of one of these groups. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Children are not always recognised as victims and can be criminalised for actions they take while under coercion.

Further information can be found at https://www.thinkuknow.co.uk/parents/articles/Are-you-worried-your-child-is-being-sexually-exploited/

CCE often includes children being forced or manipulated into transporting drugs or money through county lines, shoplifting, pickpocketing or committing violence. As children involved in CCE often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, so staff should be particularly alert to this type of exploitation. Children may have been criminally exploited even if the activity appears to be something they have agreed or consented to.

What should I do if I come across child sexual abuse material online?

1. Report it to the Internet Watch Foundation (IWF). CSA material is illegal and should immediately be reported to the IWF. IWF work to remove CSA material from online spaces, in partnership with online industry and law enforcement. You can report to IWF anonymously and will only require the URL (web address) of the content.

2. Report it to the app or site. Most apps and sites have rules they must follow about the type of content allowed as well as a duty to uphold the law. Content that breaches these rules or the law should always be reported. Childnet provide guidance on how to report to the most common sites.

3. Don't share it. Delete it. You may be unsure whether to keep or share the CSA material as evidence. Sharing CSA material is illegal and you will not need to keep it as evidence for a report. Make a note of the source/URL for your report and delete the material.

What should I do if I come across child sexual abuse material at work?

Adults should not view CSA material. Wherever possible, responses to incidents involving CSA material should be based on what the SDSO/DDSO or equivalent has been told about the imagery. If you have unavoidably viewed CSA material because a parent or child has shown it to you, speak to your SDSO/DDSO about what has happened and seek any support you need. SDSO/DDSOs can find information about responding to these incidents and safeguarding young people in the Sharing nudes and semi-nudes UKCIS guidance. A Welsh version of this guidance is also available.

If you find CSA material on a work device, do not make any changes to the device or its contents. Contact your local police force, and wherever feasible, store the device in a secure location. Local police contact information can be found at https://www.police.uk/contact/ or by calling 101.

Looking after yourself

Coming across CSA material can be distressing, it is important that once you have reported the crime, you consider the steps you need to take for your own wellbeing. This will be different for every individual, however talking to someone is often helpful. You may want to speak to a friend or family member, or prefer to speak confidentially to a support service such as NSPCC's helpline or Samaritans.

You may also find it helpful to know what has happened as a result of your report, to help you move on from feelings of distress. If this is the case you will need to provide your contact email address when submitting a report to IWF, they will then be able to inform you at a later date what happened to your report.

Honour based abuse:

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practicessuch as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

As with all matters pertaining to the maintenance of a safeguarding culture within the way we operate and in our tutoring sessions, staff are expected to be vigilant in identifying concerns and ensuring these are passed to their safeguarding lead without delay. The Safeguarding Lead/SDSO/DDSO will take further advice from the Safeguarding Children Partnership and make a referral where this is deemed necessary.

Female Genital Mutilation (FGM):

All staff should be alert to the possibility of a girl being at risk of, or already having suffered, FGM (sometimes referredto as female circumcision). Victims are likely to come from a community that is known to practise FGM. The age at which FGM is carried out varies enormously and may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

There is a range of potential indicators that a member may be at risk, the most pertinent being a parent notifying us that the child will be absent from our sessions for an extended period of time with an unconvincing explanation for the absence. FGM may already have happened if a girl has difficulty walking, sitting or standing or spending longer than usual away from a classroom during the day with bladder problems.

Concerns should be reported immediately to the safeguarding lead and the company Safeguarding Team, who will involve the Safeguarding Children Partnership as appropriate. If a member of staff discovers that FGM appears to have been carried out on a child, they should personally report this directly to the police. This is a mandatory duty.

Further information can be found at: Multi-agency statutory guidance on FGM and FGM Help & Advice

Forced Marriage:

Forcing a person into a marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Some communities use religion and culture as a wayto coerce a person into marriage. Further information can be found at:

https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Preventing Radicalisation:

We recognise our responsibility to protect children from being radicalised or drawn into terrorism. We support the 'Prevent Strategy', which works to prevent the growth of issues that create a climate which encourages radicalisation and extremism, which in turn can lead to acts of violence or terrorism. Indicators of vulnerability to radicalisation include:

- Family tensions.
- Sense of isolation/low self-esteem/feeling of failure.
- Distance from cultural heritage/events affecting the member's country or region.
- A sense of grievance triggered by personal experience.

Early indicators of radicalisation or extremism may include:

- Becoming involved with a new group of friends.
- Searching for answers to questions about identity, faith and belonging.
- Expressions of support for terrorism, justifying the use of violence to solve real or perceived grievances.
- Possessing or accessing extremist materials.
- Changes in behaviour or language.

It is important to note that children experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour, including those already detailed in this policy. Protecting children from the risk of radicalisation is part of our wider safeguarding duties and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. Further information can be found at: https://www.gov.uk/government/publications/prevent-duty-guidance

Domestic Abuse:

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Children left at home alone:

This is a common occurrence, but is potentially dangerous for children physically and emotionally. The NSPCC says:

- children under 12 are rarely mature enough to be left alone for a long period of time
- children under 16 should not be left alone overnight
- babies, toddlers and very young children should never be left alone

If a member of staff is concerned (for example, if a child mentions being home alone, or they appear to be home alone in an online session), they should inform their Safeguarding Lead. The Safeguarding Lead may decide to contact the parents, to check when someone is due to return and to express serious concern, and highlighting the risks to the child. Reassurance will be sought from the parents that such a situation will not be repeated. If such reassurance is refused and the child continues to be left at home alone, the Safeguarding Lead should contact their local CSC team.

Private Fostering:

If we become aware that one of our students is being cared for 28 days or more by someone who is not their parent or aclose relative, we will refer the arrangement to the LA Children's Services. Where the tutoring session is delivered inconnection with the school, we will first confirm with the school whether they have already made a referral to the LA's Children's Services. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

Medical Conditions:

If there has been an incident relating to the management of a child's medical condition (including allergies), it would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an

incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk.

Responsibility

Staff made aware of suspicions, allegations or actual abuse, are responsible to take the appropriate action according to this procedure.

- The primary responsibility of the person who first suspects or who is told of abuse is to report it to the safeguarding lead member of staff, and to ensure that all reports and suspicions are taken seriously whilst adhering to the dos and don'ts below.
- It is not for staff to decide whether a suspicion or allegation is true.
- Staff should never try to deal with a suspicion, allegation or actual incident of abuse by themselves.
- The safeguarding lead will take responsibility for dealing with allegations or suspicions of abuse and liaising withappropriate authorities.

What to do upon suspicion or disclosure of abuse

There are some basic principles in reacting to suspicions, allegations, and/or disclosures. Follow our **CHAIRS** principle:

WHAT TO DO:	WHAT NOT TO DO
COMMUNICATE: Stay calm, provide a safe, private environment. Take the time to give your full attention; listen, hear, be supportive and show you believe them. Encourage the child to tell you as much as they feel comfortable to. Give time to the person to say whatthey want in their own words, try not to interrupt. Use Open Questions i.e. "Can you tell me more about what happened?" Describe, Explain Establish the facts where possible and clarify: who, when, where, what, why, how, how frequent? etc Try to distinguish if this was behaviour management or potential abuse. Reassure and explain that they have done the right thingin telling someone. Explain that only those professionals who need to know will be informed. **HISTORY** Any previous concerns or disclosures? - check records and speak with the management team **ASSESS THE RISK** Consider if it is safe and appropriate for the child to go home, or to discuss with their parents/guardians, or if this may put the child at risk. **INFORM** Act immediately in accordance with our policies. Report to the lead member of staff in your team. All cases must be escalated to the company SDSO/DDSO in the Safeguarding Team. **RECORD** Record in writing in verbatim what they said asap. Save Report in One Drive Compliance Incident Folder. Consider if further Care Plans are required: Care Plan, Parental Access & Responsibility Care Plan, Intimate Care Plan, or Child Risk Assessment. **SUPPORT** Care for all those involved: yourself, staff, child, parent/guardian.	Ignore the situation. Panic or over-react. It is unlikely that the child is in immediate danger. Make assumptions. Don't paraphrase or offer alternative explanations. Ask leading questions, or put words in their mouth, this could influence what they say and lead to a false statement. Push the child if they do not wish to discuss it. Heavily questioning the child may affect how the child's disclosure is received at a later date. Accuse the child of doing anything wrong, or deserving what happened. Make a child repeat a story unnecessarily. This cancause further distress. Promise confidentiality to keep secrets or that everything will be ok, you cannot guarantee this. Try to deal with it by yourself, it is not your role to counsel the child or investigate their claims. Always contact the safeguarding lead. Make negative comments about any person in the allegation. Always remain impartial. Gossip with colleagues about what has been said to you.Only discuss with senior staff that need to be informed.

Reporting suspected, alleged, or actual incidents of abuse

Allegations against staff should be raised in accordance with the Managing Allegations Against Members of Staff policy. All other suspected, alleged, or actual incidents of abuse should be reported in accordance with the below procedure.

It may sometimes be difficult to accept that something has been disclosed in confidence by a child or anyone else.

But the welfare of a child must be paramount, and you therefore have a duty to report all suspicions, allegations or actual incidents to the safeguarding lead immediately. If the safeguarding lead is unavailable, the report should be made directly to the company Safeguarding Team. They should be notified of all safeguarding concerns asap, but always within 24 hours. Information should be reported if you have concerns that a child may be suffering harm or at risk from abuse (for any reason, based upon anything staff suspect may have happened in school, in centre, outside of school, at home or online), even if you are unsure about your suspicions.Staff should not assume another colleague or professional will take action. Staff should be aware that the GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purpose of keeping children and young people safe.

Staff are reminded that normal referral processes must be used when there are concerns about children who maybe at risk of being drawn into terrorism and for all instances of child-on-child abuse (including child on child sexual harassment and/or sexual violence).

Once this initial report has been made, the safeguarding lead member of staff will consider the appropriate courseof action in accordance with the local authority's referral thresholds. Such action may involve consulting with the relevant statutory agencies, which will be done immediately where a child is suffering, or is likely to suffer from harm. Where the disclosure was made during a school visit, the DSL at the school will always be notified and Explore Learning will work with the school in accordance with the school's safeguarding procedure.

The child's parent/carer will normally be contacted and kept informed of any action to be taken under these procedures. The decision as to when to contact parents will be made by the Safeguarding Lead, supported by the SDSO/DDSO. However, there may be circumstances when the Safeguarding Lead will need to consult the Local Authority Designated Officer, Children's Social Care and / or the police before discussing details with parents, for example, if doing so could put the child at risk of harm. In all cases, the Safeguarding Lead will be guided by the Local Safeguarding Partnership Arrangement procedures.

Making a referral

A referral to the police:

In the event that a crime has been committed, the safeguarding lead member of staff has a legal duty to report a concern directly to the Police. This includes the reporting of concerns of physical punishment in areas of the UK where smacking is illegal.

A referral to local authority services:

All serious child protection concerns must be reported by the safeguarding lead to the Local Authority Services. As Explore Learning is a nationwide organisation, the relevant local authority services will vary according to wherethe child lives.

In Physical Centres: Local contacts are displayed on the Emergency Numbers Poster in the centre's office.
Online Learning: Where a disclosure was made within an online learning session, the applicable local contacts will be those in the child's local area.

These local authority services include:

Local Safeguarding Partnership Arrangements Safeguarding Team & Out of Hours Emergency Duty Team
Safeguarding Partners / MASH/Early Help - Multi Agency Safeguarding Hub
Emergency Services – Police, Ambulance

If the referral is made by telephone, this should be followed up in writing.The following information may be required:

- Staff name, address, telephone number, position/role within the setting.
- As many details about the child as possible, e.g. name, date of birth, address, home telephone number, school, home environment.
- What the reasons are for making a referral, e.g. suspicion, allegations, disclosure - what has been said, giving details of times and dates and the child's emotional state, or what the child has said in response to the suspicions/concerns. Make a clear distinction between what is fact, opinion and hearsay.
- What action has been taken so far.
- Where possible, a referral to Children's Social Care should be confirmed in writing within 24 hours. Ensure you obtain the name of the services worker and a case number to be recorded on the Incident Report.

The relevant statutory agency will then give instructions as to what to do next and take the responsibility for further action.

Statutory safeguarding procedures

What happens next is entirely up to the relevant statutory agency, usually Children's Social Care.

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps, and the type of response that is required (if this is not received,the safeguarding lead should contact Children's Social Care again). This will include determining whether:

- the child requires immediate protection and urgent action is required;
- the 'child is in need', and should be assessed under **section 17** of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer 'significant harm', and whether enquiries must be made and the child assessed under **section 47** of the Children Act 1989;
- any services are required by the child and family and what type of services;
- further specialist assessments are required to help the local authority to decide what further action to take; and to see the child as soon as possible if the decision is taken that the referral requires further assessment.

Enough information passed onto the agency may lead to the suspicion, allegation or actual incident, being dealt with quickly with few complications, or it may lead to thorough checks with several other organisations and possibly a safeguarding conference or a visit from an Ofsted Inspector.

A safeguarding conference involves as many relevant people as possible, (including the parents/guardian and sometimes the child as well), who discuss the issues that have been raised in the suspicions, allegation or actual abuse that has been reported and investigated. Decisions about what will happen next are made at the conference.

Quite often, the initial person who has made the report may not be contacted again unless further information is required. It is not usual practice for the relevant statutory agency to inform of developments in an investigation. However, if you feel not enough action has been taken, and the child is still at risk, concerns should be reported again, or the NSPCC Child Protection Help Line contacted for advice. If staff have not heard back, they should follow up within 7 days to ensure it has been actioned.

Internal management

If it is decided that an external referral is not required, a member of the company's Central Safeguarding Team will communicate how the matter should be handled internally. This will include keeping the matter under review and considerationwill be given to a referral to Children's Social Care if the child's situation does not appear to be improving. Where the tutoring in question is being delivered in partnership with a school, the centre's Safeguarding Lead will work in close partnership with the school's DSL to determine how the matter should be handled.

If a child is in immediate danger or at risk of harm

If a child is in immediate danger or is at risk of harm, a referral should be made to Children's Social Care and / or the police immediately. Anybody can make a referral in these circumstances.

If a referral is made by someone other than the safeguarding lead, the SDSO (or in their absence, the DDSO) shouldbe informed of the referral as soon as possible. Where the tutoring was being delivered in partnership with a school, the school's DSL must also be informed of the referral as soon as possible.

Recording suspected or actual incidents

No matter what happens to a suspicion, allegation or actual incident of abuse, (regardless of whether it is processed through a statutory agency or not), all details must be recorded. Important information to recordincludes:

- The date and time of disclosure, suspicion, allegation or actual abuse incident.
- Details given to you about the above, e.g. date and time of when things occurred.
- Any indication of the parties involved.
- Details of the action that you and the setting have taken.
- Details of reporting, including who to, both internally and statutory agencies, and when.
- Name of staff reporting and witnesses (if applicable)
- Name of parent/guardian if permitted to inform

If for any reason it is decided not to consult with a relevant statutory agency, a rationale for any decisions made must be recorded.

Recording must be factual, that is no reference made to subjective opinions.

Electronic Incident Record forms should be used for reporting. All physical and online teams should file completed forms in their centre's or communities One Drive Compliance Incident Folders, shared with the company's Central Safeguarding Team. They may also advise a team to implement:

- a Care Plan to support the child's wellbeing and centrally record how they are supported within and outside the centre/community,
- a Parental Responsibility and Access Care Plan
- an Intimate Care Plan
- Child Risk Assessment

Records should be kept completely confidential and secure and only shared with those who need to know about the suspicion, allegation or actual incident of abuse.

Incidents and all types of Care Plans reported to the company's Central Safeguarding Team will be recorded on the company's Central Incident Record file.

Reports must be deleted from laptops or other devices for data protection purposes once shared.

Early Help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners working together and taking collective responsibility to provide the right provision in their area.

Some early help is provided through "universal services", such as education and health services. They are universal services because they are available to all families, regardless of their needs. Other early help services are coordinated by a local authority and/or their partners to address specific concerns within a family and can be described as targeted early help. Examples of these include parenting support, mental health support, youth services, youth offending teams and housing and employment services.

Early help may be appropriate for children and families who have several needs, or whose circumstances might make them more vulnerable. It is a voluntary approach, requiring the family's consent to receive support and services offered. These may be provided before and/or after statutory intervention.

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

- is disabled
- has special educational needs (whether or not they have a statutory education, health and care (EHC) plan)
- is a young carer
- is bereaved
- is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised
- is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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
- is suffering from mental ill health
- has returned home to their family from care
- is a privately fostered child
- has a parent or carer in custody
- is missing education, or persistently absent from school, or not in receipt of fulltime education
- has experienced multiple suspensions and is at risk of, or has been permanently excluded

Advice for staff on obtaining Early Help for members is available on our staff intranet.

Historical/Non recent Abuse

Historical or non-recent allegations of abuse are any concerns that relate to abuse that happened more than a year ago, whether involving anyone working for/ belonging to the organisation or outside of it. Often victims of abuse take many years to come forward due to the shame and fear of being disbelieved, however the alleged perpetrator may remain a risk to others. Such allegations of abuse must be taken seriously and acted upon in line with our safeguarding procedures, even if the victim is no longer being harmed now.

ONLINE LEARNING - SAFETY POLICY AND PROCEDURES

Policy Statement

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children participating in online tuition. This policy is designed to be read alongside Explore Learning's Safeguarding Policy and Safeguarding Procedures and applies to all staff, children and young people, and anyone involved in Explore Learning's activities. This policy takes into account the KCSIE 2026 guidance, and the NSPCC's guidance on remote learning which is referenced in KCSIE.

Policy Aims

The purpose of this policy is to:

- Ensure the safety and wellbeing of children and young people is paramount when adults, young people or children are using the internet, social media or mobile devices whilst participating in sessions
- Provide Managers and Tutoring staff with the overarching principles that guide our approach to online safety
- Safeguard all members, families and staff when participating in online sessions with Explore Learning
- Ensure that, as an organisation, we operate within the law in terms of how we use online devices
- Identify the responsibilities of all persons associated with Explore Learning with regards to online safety

We believe that children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times.

We recognise that:

- the online world provides everyone with many opportunities; however it can also present risks and challenges
- we have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- we have a responsibility to help keep children safe online, whether or not they are using Explore Learning's network, devices and approved platforms for online tuition
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation,have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents/guardians, and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety
- Explore Learning Managers and authorised members of the Central Team have the right to join and observe online sessions on our Compass platform or Microsoft Teams at any time for training, monitoring and safeguarding purposes, without previously notifying tutoring staff or attending members. Tutoring staff will always be alerted by an observer's full name pop up indicating when an observer joins the session.
- There is no need from a safeguarding perspective for staff to video record (or sound record) meetings. Doing so raises substantive data protection and accountability issues and is therefore forbidden.

Responsibilities

Tutoring Staff will:

- ensure they are punctual and ready to begin sessions on time.
- repeated lateness will not be tolerated and may lead to disciplinary action or dismissal
- ensure all children have left a session before the Tutor logs out to ensure children are not left unsupervised
- ensure their camera is working and switched on at all times during the session; they will blank/blur their background where possible and ensure that their environment does not display any personal or inappropriate information or imagery that could be viewed by the member and supervising adult
- ensure sessions are taken in a private and professional environment with no distractions;

- only permit enrolled members with pre-booked sessions into online learning platforms. Attempted unauthorisedaccess will be reported as an incident and appropriate action will be taken
- remain vigilant, ensure no one else is present/visible in their own or the child's environment who shouldn't be
- never discuss personal matters or share personal details including contact information with children or their families. Communications will be made via official Explore channels only
- never arrange to meet up with members or their families, either virtually or physically outside of scheduled learning sessions, and ensure that contact is appropriate to their role as a Tutor
- only encourage use of Explore Learning recommended tools and resources shared in sessions
- if children are using online platforms, encourage safe practice and consider the potential dangers and the age appropriateness of them
- monitor member internet use closely when tutoring and report the use of any other sites/platforms visited as appropriate for their safety
- always end a session immediately if a child does or says anything inappropriate, i.e. enters a bathroom
- alert your Tutor Coordinator immediately during a session of any unusual activity or concerns about a child or another member of staff in accordance with company Safeguarding Procedures
- remain vigilant at all times and communicate any concerns regarding child supervision immediately to the Tutor Coordinator in charge of coordinating sessions who will take the appropriate action
- follow and adhere to all aspects of company Use of Own Device Policy
- wear suitable clothing when engaged in video lessons or video meetings.
- language must be professional and appropriate.
- ensure any resources shared with members are appropriate to their age and directly related to the curriculum, scheme of work
- ensure that, should anything occur during a 1:1 session and/or group sessions that causes concern, they immediately draw the meetingto a close and report their concern
- never make contact with Explore Learning families directly via any platform outside of their booked sessions. They can reach out to their management team who can email or call families as and when required.
- only contact members at times when a session has been scheduled within a centre or community's operational hours.

Managers and Tutor Coordinators will:

- complete Online Safeguarding e-learning training to support them in their role
- ensure tutoring staff are trained appropriately in Online Safeguarding so they are confident in their role with keeping children safe
- ensure staff have been cleared as suitable to work before allowing them to work with members and their families
- respond to any concerns of safeguarding, behaviour and wellbeing reported from all participants urgently and following the appropriate company procedure
- moderate online sessions by having the ability to observe or co-tutor sessions at any time to ensure that tutoring is in linewith expectations
- ensure that all parties participating in online sessions are treated with equal respect and dignity
- only schedule or rearrange member sessions within their working hours
- support members and families in keeping safe when using online platforms for learning and direct parents/guardians to suitable e-safety guidance and resources
- use their @Explore Learning accounts to communicate via email or our online platforms - staff must never use their own personal accounts. Staff must make sure any phone calls made from a personal phone are made from a blocked number so that their personal contact details are not visible
- follow and adhere to all aspects of company Use of Own Device Policy

Parents/Guardians agree to:

- consent to their child's participation in online 1:1 and/or group sessions through enrolment to Explore Learning
- only schedule or request to rearrange sessions within their centre or community managers' working hours
- support their children to participate appropriately and safely, to mitigate the risks associated with online learning.Parents/guardians are guided to online safety resources via the FAQs section of the Explore Learning website and are advised to add appropriate child locks/filters and check/clear the internet browsing history

as required
- support children in understanding that comments posted online will be seen by others and cannot be edited/deleted, which can become part of their digital footprint
- always be responsible for the welfare of their child whilst undertaking online sessions, monitoring their use of other sites and platforms alongside their learning with Explore
- ensure their child is undertaking sessions in a safe, suitable environment, is dressed appropriately, ready to learn
- never share links/invitations to Explore Learning online sessions with anyone else
- report any concerns they have regarding their child's participation in online sessions with Explore Learning staff
- ensure children under 12 and those with additional medical or educational needs are supervised during their sessions by a responsible person, aged over 16.
- remain nearby for the duration of the session - to be available for session feedback at the end and respond to concerns or emergencies throughout
- treat Explore Learning staff with fairness and respect at all times and ensure that members also adhere to this
- report any inappropriate or illegal behaviour by other members in group sessions or staff to a Manager or centrally to the Explore Learning Central Team immediately, in accordance with this policy
- only respond to communications via official Explore Learning channels using their own email accounts (not child's),and report any concerns of unauthorised contact from Tutoring staff to Management urgently
- never attempt to make contact with or befriend their Tutor or Management staff on social media or seek out their personal contact information through any communication channels
- understand that any child/family member behaving disruptively during an online session, including making inappropriate comments or gestures, will be removed from the call immediately and appropriate action will betaken in line with our Safeguarding and Guidelines for Managing Children Policies. Behaviour such as threats or harassment of others, hate speech, threats of violence and posting personal information will not be tolerated
- support their child in understanding their responsibilities during online sessions as outlined below

Explore Learning Members must:

- always behave appropriately during sessions and understand what behaviours constitute as inappropriate anddisruptive
- treat their tutor and other session participants with respect at all times
- never attempt to make contact with or befriend their Tutor or Management staff on social media or seek out their personal contact information through any communication channels
- understand the implications of posting comments and images online and the risks associated with sharing personal information on websites and platforms
- report any concerns regarding safety, behaviour and wellbeing to an appropriate adult immediately

<u>Online Safeguarding Procedures</u>

We will seek to keep children and young people safe by:

- providing clear and specific directions to staff on how to behave online through our staff Code of Conduct
- supporting and encouraging our members to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- supporting and encouraging parents/guardians to do what they can to keep their children safe online
- having clear and robust procedures in place to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by a member of staff, child or family member
- reviewing and updating the security of our information systems regularly (see IT Security Policy and Procedures)
- ensuring that usernames, logins, email accounts and passwords are used effectively (see ICT Security Policy and Procedures)
- ensuring personal information about the adults and children who are involved in our organisation is held securelyand shared only as appropriate (see Privacy Policy)
- providing supervision and support for staff and volunteers about online safety
- examining and risk assessing any social media platforms and new technologies before they are used within

the organisation

If online abuse occurs, we will respond to it by:

- having clear and robust safeguarding procedures in place for responding to abuse (including online abuse) See Safeguarding Procedures
- providing support on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisationas a whole into account
- reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problemshave been resolved in the long term

Where staff are concerned that a child may be vulnerable to or experiencing online abuse, they must follow company Safeguarding Procedures and report immediately to the company's Central Safeguarding Team, who can support in escalating to the relevant authorities and organisations. In the event that a crime has been committed or a child is in immediate danger, call 999.

To report someone behaving suspiciously online towards a child, contact CEOP – Child Exploitation and Online Protection Command https://www.ceop.police.uk/ceop-reporting/

To report criminal content relating to child sexual abuse, contact IWF - Internet Watch Foundation report.iwf.org.uk/en

Acceptable Use of Explore Learning's IT Systems

The "acceptable use" rules apply to all staff and all members of the Explore Learning community who use our IT systems.

Online behaviour

- Do not access, create or share content that is illegal, deceptive, or likely to offend other members of the Explore Learning community (for example, content that is obscene, or promotes violence, discrimination, or extremism, or raises safeguarding issues).
- Respect the privacy of others. Do not share photos, videos, contact details, or other information about membersof the Explore Learning community, even if the content is not shared publicly, without going through official channels and obtaining permission.
- Do not access or share material that infringes copyright, and do not claim the work of others as your own.
- Do not use the internet to distribute malicious software, to damage, interfere with, or gain unauthorised accessto the computer systems of others, or carry out illegal activities.
- Staff should not use their personal email, or social media accounts to contact members or parents, and membersand parents should not attempt to discover or contact the personal email addresses or social media accounts of staff.

Using Explore Learning's systems

Whenever you use Explore Learning's IT systems (including by connecting your own device to the network) youshould follow these principles:

- Only access our systems using your own username and password. Do not share your username or password with anyone else.
- Do not attempt to circumvent the content filters or other security measures installed on our IT systems, and donot attempt to access parts of the system that you do not have permission to access.
- Do not attempt to install software on, or otherwise alter, Explore Learning's IT systems.
- Do not use Explore Learning's IT systems in a way that breaches the principles of online behaviour set out above.

- Remember that Explore Learning monitors use of its IT systems, and that we can view content accessed or sent via our systems.

Use of Property

Any property belonging to Explore Learning should be treated with respect and care and used only in accordance with any training and policies provided. You must report any faults or breakages without delay to the Facilities Manager or the IT team by logging a helpdesk ticket.

Use of Explore Learning's systems

The provision of any Explore Learning email accounts, Wi-Fi and internet access is for official Explore Learning business, administration and education. Staff and members should keep their personal, family and social lives separate from their Explore Learning IT use and limit as far as possible any personal use of these accounts. Please be aware of Explore Learning's right to monitor and access web history and email use.

Monitoring and access

Staff, parents and members should be aware that Explore Learning IT usage (including through our Wi-Fi) will be monitored for safeguarding, conduct and performance purposes, and both web history and any Explore Learningemail accounts may be accessed by us where necessary for a lawful purpose – including serious conduct or welfare concerns, extremism and the protection of others.

Any personal devices used by members, whether or not such devices are permitted, may be confiscated and examined under such circumstances.

INTIMATE CARE POLICY

Explore Learning is committed to safeguarding the dignity, rights, and welfare of all children and young people in our care. This Intimate Care Policy provides guidance for staff to deliver appropriate support for children aged 3–17 years who require assistance with personal care in line with our safeguarding responsibilities, equality obligations, and the highest standards of professionalism.

Intimate care refers to any personal care which involves the touching of private parts of the body, or any tasks that require the removal of clothing. This may include assistance with:

- Toileting
- Changing clothes
- Menstrual hygiene
- Application of creams or ointments
- Any other personal hygiene needs that most children carry out themselves, but which some are unable to do due to developmental delay, physical difficulties or other health needs.

Explore Learning recognises that some children, particularly those in the Early Years or with special educational needs and disabilities (SEND), may require help with toileting, changing or personal hygiene. The welfare of the child is paramount and their right to privacy, dignity and autonomy will be respected at all times.

This policy applies to all staff. It covers intimate care for children aged 3 to 17 years, recognizing that needs may vary based on age, developmental stage, and individual requirements.

This policy aims to:

- Safeguard the dignity, rights and wellbeing of children who require assistance with intimate care.
- Ensure staff understand their responsibilities and apply best practice when supporting children with personal care.
- Provide clear procedures to protect children and staff from harm or allegations of harm.
- Promote effective partnership working with parents/guardians.
- Ensure compliance with relevant legislation including the Children Act 1989, Equality Act 2010, GDPR, and Keeping Children Safe in Education (KCSIE) 2026.

Principles of Intimate Care

Explore Learning will ensure that:

- Intimate care is provided in a safe, respectful, professional, and age-appropriate manner.
- Children are supported to do as much for themselves as they are able to promote independence, while maintaining personal hygiene.
- The child's welfare and dignity are paramount at all times.
- Child-Centered Approach: The preferences and feelings of the child will be taken into consideration at all times.
- Informed Consent: Wherever possible, children will be involved in the decision-making process regarding their care.
- All intimate care needs are agreed with parents/guardians and documented in an *Intimate Care Plan*.
- Children are never left in soiled or unhygienic conditions and are cleaned promptly with sensitivity.
- All staff involved in intimate care are aged over 18 years, safeguarding trained and vetted through safer recruitment procedures, including Enhanced DBS checks.
- Where possible, intimate care is provided by staff of the same gender.

Procedures

Intimate Care Plans

- An *Intimate Care Plan* will be developed for each child who requires regular personal care support.
- Plans are developed collaboratively with parents/guardians and where appropriate, the child, to ensure needs and preferences are understood.
- Plans will include:
    - Details of the child's specific needs and level of support required.
    - Arrangements for toileting, changing, washing or medical care.
    - Consent for any equipment or creams required.
    - Clear guidelines for staff in the event of a concern or incident.

Parental Involvement

- Parents/guardians are asked to provide full information on the child's care needs during registration.
- Changes in needs should be communicated promptly and plans updated accordingly.
- Parents/guardians will be informed if any incident or concern arises during the provision of intimate care.

Staff Guidance

- Intimate Care must only be provided when necessary in an emergency if it has not been pre agreed with parent/guardian. Children without an Intimate Care Plan should be assisted through verbal instruction and minimal physical intervention according to our Toilet Incident Guide.
- Staff must adhere to the procedures set out in the child's *Intimate Care Plan* and report any deviation to the Safeguarding Lead.
- Before initiating intimate care procedures with a child, staff must first alert a second member of staff, preferably another Manager to the fact, the location and the details of the care to be provided. Procedures must wherever possible, be provided with 2 staff members in attendance, or one outside the area for support/supervision.
- Intimate care will be provided in a private space. Staff will ensure that other children are kept at a distance to protect privacy.
- Staff will communicate clearly with the child during the process, explaining what they are doing and why.
- Intimate care must always be delivered in a calm, reassuring and child-centred manner.
- Staff must:
    - Wear disposable gloves and disposable aprons.
    - Ensure the area is private and maintain the child's dignity.
    - Encourage the child to do as much as they can independently.
    - Use appropriate and non-judgmental language.
    - Maintain professional boundaries at all times.
- For pupils needing routine intimate care, the parents/guardians are expected to provide nappies and wipes etc.
- Any soiled clothing will be contained securely, clearly labelled, and discreetly returned to parents/guardians at collection.

Record Keeping

- A written record must be kept each time intimate care is provided on an Incident Form saved to the centre's OneDrive Compliance Folder.
- Records should include:
    - The date and time.
    - The nature of the care provided.
    - The names of staff present.

    - Any concerns, incidents or accidents.
- These records must be stored securely in line with GDPR and confidentiality policies.

Safeguarding

- Any unusual markings, injuries or disclosures made by the child must be recorded and reported immediately in line with Explore Learning's *Safeguarding Procedures*.
- Staff must never carry out a task that they have not been trained to do.
- Staff must never engage in inappropriate physical contact or use of language.
- Any concerns about a staff member's conduct must be reported immediately following the *Managing Allegations Against Staff* policy.

Training and Supervision

- All staff delivering intimate care will complete training in:
    - Safeguarding and child protection.
    - Infection control and hygiene.
    - Supporting children with SEND and additional needs.
    - The individual's Intimate Care Plan.
    - If necessary, manual handling training (including the use of equipment where required) that enables them to remain safe and for the pupil to have as much participation as is possible.
- Staff will be supported through supervision and review of care arrangements by their Centre Director.

Monitoring and Review

- Intimate Care Plans will be reviewed at least annually, or sooner if the child's needs change.

USE OF OWN DEVICE POLICY

This policy applies to employees who work remotely, for example from home, or who bring their computers (or other devices, for example mobile telephones or tablets) into work. The policy also covers those employees who work exclusively on personal laptops as well as those who receive/make work-related emails on their mobile telephones. Explore Learning cannot accept liability for the loss or damage of personal property.

Policy Aim

The aim of the policy is to set out how employees ensure that they protect any data while working from home or when bringing their own devices to work. This policy should be read in conjunction with Explore Learning's privacy policy, Working from home policy, the Code of Conduct, and the Online Learning – Safety Policy and Procedures.

Data Protection

Explore Learning is the data controller in relation to work-related personal data that is held on personal devices. The Data Privacy Manager is responsible for the organisation's data protection.

General Data Protection Regulation (GDPR)

The GDPR requires the organisation to process any personal data in accordance with the six data protection principles (see the organisation's separate Privacy policy). "Processing" includes obtaining personal information, retaining and using it, allowing it to be accessed, disclosing it and, finally, disposing of it. The sixth data protection principle requires the organisation to ensure that personal data is protected by appropriate technical and organisational measures against unauthorised or unlawful processing or disclosure, and against accidental loss, damage or destruction.

Employees' obligations regarding Use of Own Device

Device Security:

- Password and Authentication: Before using their own device for work-related purposes, an employee must secure it with a strong password (at least 12 characters long, including a mix of uppercase letters, lowercase letters, numbers, and special characters). Use of biometric security such as fingerprint or face recognition is also permitted.
- Automatic Locking: The device must automatically lock if an incorrect password is entered after five attempts or if the device remains inactive for a specified period.
- Regular Updates: Operating system and app updates must be applied regularly to maintain security compliance.
- Encryption Requirement: Devices must be encrypted (e.g. BitLocker, FileVault, or native mobile encryption). If you're unsure whether your device is compliant, contact IT.

Data Protection:

- Do not store or download work-related data directly onto personal devices. Access must be via approved secure apps only.
- Application Management: Use separate, approved applications for business and personal tasks.
- Employees must not, under any circumstances, use corporate personal information for any purpose other than for their work and as directed or instructed by the organisation.

Network Security:

- Secure Communications: Secure any data transfer via email through the Explore Learning email account and only use secure Wi-Fi connections. Employ a Virtual Private Network (VPN) when necessary.
- Public Wi-Fi: Avoid the use of unsecured public Wi-Fi networks.

Security Software:

- Required Installations: Install and maintain approved security software, including antivirus and anti-malware programs, to provide ongoing protection against threats.

Incident Response and Reporting:

- Prompt Reporting: Immediately report the loss or theft of a device used for work-related activities to the IT department. Report any data breaches or security incidents to the Data Privacy Manager as soon as they are detected.

Compliance and Training:

- Regular Assessments: Participate in regular IT assessments of personal devices for security compliance.
- Training Sessions: Engage in regular training sessions on security best practices and emerging threats.
- Periodic Training: All staff may be asked to participate in refresher training or phishing simulations to maintain awareness of evolving threats.
- Periodic Audits: Comply with periodic audits conducted to ensure adherence to these policies.

Device and Data Management Upon Exit:

- Data Removal: Follow procedures for the removal of organizational data from personal devices upon termination of employment, ensuring all data is securely wiped.
- Device Disposal: Adhere to guidelines on how to properly dispose of or recycle devices that are no longer in use to ensure all organizational data is securely deleted.
- IT may request evidence that data has been deleted prior to final day.

Mobile-device management

Employees should not store any corporate data on a personal mobile device. It is also recommended that employees use a mobile-device management tool. Both Samsung and Apple include this as part of their phone's operating system ("Find my iPhone", "Find my Mobile"). In the event that the device is stolen, upgraded, recycled for money or given to family or friends, the tools allow the employee to be able to locate the device remotely, lock the device and wipe the device on demand.

Technical support

If employees require any technical support with their devices, they should ensure that the third party providing such support has access to any data insofar as is necessary to complete their work and that data is not transferred to a third-party device unless there is no other way of rectifying the technical problem. If datais transferred to a third-party device, the third party must warrant, and the employee must ensure, that the information is removed permanently from such third-party device once the problem has been rectified.

Retention of company data

Employees must not retain company data (including any personal data of members or employees) for longer than is necessary for the purpose for which it is being used, unless there is a requirement to retain it for longer to comply with any legal obligation. If an employee is in any doubt, they should contact the Data Privacy Manager.

Deletion of company data

Employees must ensure that if they delete information, it is deleted permanently rather than left in the device's waste-management system. The employee must:

- not give any third party access to the data in any way
- surround the data with appropriate technical and organisational security; and
- commit to the permanent deletion of the information if and when this becomes possible

If an employee uses removable media, for example a USB stick, to transfer data, they must ensure that the data

is deleted once the transfer is complete.

Co-operation with subject access requests

Any individual whose personal data is held by the organisation has the right to make a subject access request (see the organisation's Data Protection Policy for more information). This means that, if an individual makesa subject access request, the organisation may need to remotely access your device to retrieve any data thatis held on it about the individual. You must allow the organisation to access the device remotely and comply with requests to find any information about the individual held on the device.

Third-party use of device

Employees must ensure that, if family or friends use their devices, they are unable to gain access to any personal information that is work-related by, for example, password-protecting it.

Termination of employment

If an employee leaves the organisation, they must delete all work-related company data on their own deviceprior to their last day with the organisation. Where requested, confirmation of data deletion may be required.

Monitoring

As part of its ongoing obligations under the GDPR, the organisation will monitor data protection compliance in general and compliance with this policy. This monitoring is in the organisation's legitimate interests, to ensure that the policy is being complied with, and to ensure that the organisation is complying with its legal obligations under the GDPR.

Applications that have been installed for personal use will not be monitored: monitoring will be limited to business-related applications, e.g. your Explore Learning account

Storage of images and videos

It is forbidden for staff to store or share any images or videos of children/members on their own devices.

Use of AI Tools on Personal Devices

The use of generative AI tools on personal devices is governed by the “AI at Explore Learning” policy. Staff must only use approved AI tools, must never share personal, member or otherwise confidential data with non-approved tools, and must always review AI-generated outputs before use. Refer to the AI at Explore Learning policy for the current list of approved tools and full guidance.

Consequences of non-compliance

If an employee is suspected of breaching this policy, the organisation will investigate the matter under its disciplinary procedure. If any breaches are established, this could result in disciplinary action.

The organisation will review and ensure compliance with this policy at regular intervals.

MANAGING ALLEGATIONS AGAINST MEMBERS OF STAFF

Policy Introduction

Explore Learning is committed to providing the highest level of care for our members, staff and any visitors attending our centre and communities. Any allegations of abuse against a member of staff are investigated as a priority to avoid any delay, consistent with a fair and thorough investigation. Our policy is in line with statutory guidance from the Department of Education KCSIE 2026 where applicable to our settings. This policy is designed to ensure that all staff, children and parents/guardians are aware of the procedure for the investigation of allegations of abuse in order that all complaints are dealt with consistently, and as efficiently as possible.

We minimise the risk of a member of staff causing harm to a child by having:

- Safer Recruitment strategies in place
- Appropriate induction and regular safeguarding training
- Open and transparent safeguarding ethos and culture including the discussion of common issues
- Staff Codes of Conduct

Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold – known as 'low level concerns') are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the Explore Learning to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Explore Learning are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

Where an allegation has been made, there will be two strands to Explore Learning's response:

1. Looking after the welfare of the child – Explore Learning's SDSO (or DDSO in their absence) will take the lead in formulating the response to managingthe child in question's welfare.
2. Investigating and supporting the person subject to the allegation – this relevant course of action will be determined via discussions with the LA's Designated Officer (LADO).

Allegations that may meet the harm threshold

The term "allegation" means it is alleged that a volunteer or member of staff who works with children 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; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children.

Concern (including an allegation) that does not meet the harm threshold – i.e. a low-level concern.

The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards a child does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

1. is inconsistent with their Code of Conduct, including inappropriate conduct outside of work; and
2. does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO, but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Procedure

All allegations against a member of staff must be brought immediately to the attention of the SDSO, regardless of whether or not they are likely to meet the harms threshold. This includes behaviour that may have happened outside Explore Learning which might make an individual unsuitable to work with children.

If the SDSO is unavailable, the Deputy Designated Safeguarding Officer (DDSO) should be told at once.

The LADO must be informed, within one working day and before any further action is taken, of all allegations that appear to meet the harms threshold criteria set out above.

All allegations will also be reported to Ofsted within 14 days of the allegation having been made.

When an allegation is received by a member of staff, whether from a school, a child, a parent, or a third party, the member of staff receiving the allegation will:

- Stay calm and provide a safe, private environment to discuss the allegation
- Take the matter seriously
- Take the time to give their full attention; listen, hear, be supportive
- Establish the facts and clarify the situation/circumstances, but not conduct their own investigation
- Make a written record of the allegation using the informant's words (including time, date and place where the alleged incident took place, what was said and anyone else present)
- Contact Explore Learning's SDSO/DDSO immediately.
- Contact the People Operations Team
- Contact the Local Authority Designated Officer (LADO) as soon as possible within 24 hours.
- Where there is an immediate threat to a child, the Police or the Emergency Children's Social Care Team (if outside office hours) must be contacted immediately.

The Role of the LADO

The LADO is responsible for the oversight of allegations made against adults working with children in the local authority, liaising with a range of agencies and ensuring such matters are dealt with consistently and in a timely fashion. The LADO (or equivalent in Scotland/Wales/Northern Ireland) must be informed with one working day and before any further action is taken, of all allegations that appear to meet the harms threshold criteria set out above. The initial discussion with the LADO will consider the nature of allegation and the course of action.

Actions to be agreed with the LADO:

- What further information is required?
- Whether any immediate action needs to be taken to protect attending children
- When and what should the parents/guardians of attending members be told
- What should be said to the member of staff facing the allegation?
- Whether suspending the member of staff is required (if children are at risk of serious harm/where the concern is so serious that it would result in immediate dismissal) or whether any risk may be managed viaother measures.

Possible outcomes of the initial discussion:

- Strategy Meeting (sometimes called a 'Management Planning Meeting') and normally held within three days of an allegation being made
- Referral to Social Care
- Referral to Police for investigation
- No further action (NFA)

In the case of NFA, the management team should then liaise with the People Operations team and Explore Learning's SDSO/DDSO to decide how to proceed further, which may include internal disciplinary action.

All discussions should be recorded in writing and any communication with both the individual concerned and the parents of the child/children agreed with the LADO and other agencies, as appropriate.

The resignation of a member of staff mid-way through an investigation will not lead to the investigation being abandoned.

Records and confidentiality

When an allegation is made, we will make every effort to maintain confidentiality while it is being investigated or considered. The reporting restrictions preventing the identification of a member of staff who is the subject of suchan allegation, in appropriate circumstances, will be observed.

Allegations that are found to be malicious will be removed from personnel records; for all other allegations, full details will be recorded on the confidential personnel file of the person accused. Any that are false, unsubstantiated or malicious, will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be includedin any reference.

We will retain these records and relevant personnel records for so long as may reasonably be required in the circumstances whilst also having regard to relevant guidance from the Information Commissioner, and the Independent Inquiry into Child Sexual Abuse (IICSA).

Low-Level Concerns

Who should staff share low-level concerns with?

It is important that low-level concerns are shared with the SDSO/DDSO as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is nevertoo late to share a low-level concern.

If the SDSO is absent for any reason, low-level concerns should be shared with the DDSO who will ensure they inform the SDSO immediately on their return.

If any low-level concern relates to the behaviour of the SDSO, it should be referred to the LADO.

How should low-level concerns be shared and recorded?

The concern can be shared verbally with the SDSO in the first instance, or a written summary of it can be provided to them.

Where the low-level concern is provided verbally, the SDSO will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise sound professional judgment in determining what information is necessary to record for safeguarding purposes.

How should a low-level concern be responded to?

Once the SDSO/DDSO has received the low-level concern, they will alongside the individual's manager – not necessarily in the below order, but in an appropriate sequence according to the nature and detail of the particular concern sharedwith them:

1. Speak to the person who raised the low-level concern (unless it has been raised anonymously).

2. Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies,

where they have been contacted).

3. Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

4. If they are in any doubt, seek advice from the LADO – on a no-names basis if necessary.

5. Review the information and determine whether the behaviour in question:

   a. is entirely consistent with our Staff Code of Conduct and the law;

   b. constitutes a low-level concern;

   c. is not serious enough to consider a referral to the LADO but may merit consulting with and seekingadvice from the LADO, and on a no-names basis if necessary;

   d. when considered with any other low-level concerns previously raised about the same person, couldnow meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with our policies, Part 4 of KCSIE 2026, and the relevant procedures and practice guidance stipulated by the Local Safeguarding Partnerships; or

   e. in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies, and in accordance with our policies, Part 4 of KCSIE 2026, and the relevant procedures and practice guidance stipulated by the Local Safeguarding Partnerships.

6. Ensure that appropriate and detailed records are kept of all internal and external conversations regardingthe concern, their determination, the rationale for their decision and any actions taken, and retain these records.

7. Consider whether the concern also potentially raises misconduct or capability issues – taking advice from the People Operations Team on a named or no-names basis where necessary – and, if so, refer the matter to People Operations.

What action will be taken if it is determined that the behaviour is entirely consistent with the Staff Code of Conduct and the law?

The SDSO/DDSO or Head of People Operations will support the Manager to update the individual in question and inform them of anyaction taken (as above).

The SDSO/DDSO or Head of People Operations will speak to the person who shared the low-level concern – to provide them with feedbackabout how and why the behaviour is consistent with our Staff Code of Conduct and the law.

What action will be taken if it is determined that the behaviour constitutes a low-level concern?

The SDSO/DDSO or Head of People Operations will respond in a sensitive and proportionate way – on the one hand maintaining confidencethat such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the

individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

Some low-level concerns may also raise issues of misconduct or poor performance. The SDSO/DDSO will also consider whether this is the case – by referring to the disciplinary and/or capability procedure and taking advice from the People Operations Team on a named or no-names basis where necessary. If the SDSO/DDSO considers that the disciplinary or capability procedure may be triggered, they will refer the matter to the People Operations Team.If People Operations advise that the disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

How long should records of a low-level concern be kept?

Low-level concerns will be retained securely for as long as deemed relevant and necessary for a safeguarding purpose unless we are required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves Explore Learning, any low-level concerns which are held relating to them:

1. will be retained; and
2. will not be included in any onward reference, except where it meets the threshold for referral to the LADO and is found to be substantiated.

Low-level concerns will be retained on Explore Learning's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

Supporting Those Involved

Where an allegation has been made, there will be two strands to Explore Learning's response:

Looking after the welfare of the child:
The Senior Designated Safeguarding Officer will take the lead in formulating the response to managing the child's welfare. Parents/guardians will be notified if their child makes or is involved in an allegation against staff if they do not already know. However, if the police or Children's Social Care are to be involved, they will be contacted first and will advise as to what information may or may not be disclosed to the parents/guardians. Parents/guardians will be made aware of any progress in the investigation, and the outcome will be explained to them.

The employee:
After consulting the LADO, the accused person should be told about the allegation and the likely course of action. The amount of detail should be agreed with the LADO. An allocated Manager will keep the subject of the allegation informed of the progress of the case and offer support to the affected person whilst an investigation is undertaken. It is important that confidentiality is maintained. It is helpful to consider how to manage speculation, leaks and gossip.

Outcome of Allegations

The outcome of allegation investigations should be identified as one of the following:

Substantiated: There is sufficient evidence to prove the allegation.
False: There is sufficient evidence to disprove the allegation.
Unsubstantiated: This is not the same as a false allegation. It means that there is insufficient evidence toprove or disprove the allegation.
Malicious: There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

- If the investigation results in the dismissal or resignation of a person, and that person has been charged witha

criminal offence, a referral must be made immediately by Explore Learning to the Independent Safeguarding Authority, as advised by the police and/or Children's Social Care.

- If it is decided that the employee may return to work (after a suspension) then provisions will be put in place by staff to ensure that the transition is as smooth as possible.
- If the child who made the allegation is still attending sessions, staff will consider what needs to be done to manage the contact between employee and child.
- Where an allegation is proven to be false, management staff may refer to Children's Social Care to determine whether the child needs additional support or care, or to help to understand if they are being abused elsewhere.
- No matter what the outcome is of an allegation of abuse against staff, staff will review the case to see if any improvements can be made to prevent similar cases in the future.

Referral to Disclosure and Barring Service/Disclosure Scotland

Under legal duties to make referrals to the Disclosure and Barring Service, Explore Learning will report any concerns about unsafe practice by any of its directors, staff or tutors to the Disclosure and Barring Service (DBS)/Disclosure Scotland.

The power to refer can be used when an organisation thinks a person has either:

- harmed or poses a risk of harm to a child or vulnerable adult
- has satisfied the harm test; or
- has received a caution or conviction for a relevant offence and;
- the person they're referring is, has or might in future be working in regulated activity and;
- the DBS may consider it appropriate for the person to be added to a barred list

If at any time Explore Learning dismisses a director, member of staff or tutor due to relevant conduct, risk of harm or receiving a caution or conviction for a relevant offence (or the person has resigned or left that post in circumstances where they may otherwise have been removed), then a referral to the Disclosure and Barring Service will be made by the Designated Safeguarding Officer.

In addition, if the member of staff is known to work as a Teacher, if an investigation leads to the dismissal or resignation prior to dismissal of a member of staff, Explore Learning must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that member of staff has displayed unacceptable professional conduct, conduct that may bring the teaching profession into disrepute or a conviction at any time for a relevant offence).

Non-Recent Allegations

Where an adult makes an allegation of historic abuse, that adult should be advised to report the allegation to the police. Non-recent allegations made by a child or adult should be reported to the LADO, who will coordinate the appropriate response. Abuse can be reported no matter how long ago it happened.

Explore LEARNING

EMERGENCY SAFEGUARDING CONTACT NUMBERS

Each physical centre has an Emergency Numbers poster on display for staff in their office.

Emergency numbers are also recorded on the Company Intranet Safeguarding page.

Explore Learning Central Safeguarding Line: 01483 447412

This number is staffed by Explore Learning's Head of Ofsted & Safeguarding (Senior Designated Safeguarding Officer, SDSO) and the Deputy Designated Safeguarding Officer (DDSO).

The Designated Safeguarding Lead for each setting are:

Physical Centre	Centre Director
Online Community	Community Manager/Lead Tutor Coordinator on duty
Emergency Services:	999
Local Police:	101
NSPCC Contact Point 24/7:	0808 800500
Childline:	0800 1111 https://www.childline.org.uk/
DFE Counter Extremism Helpline:	020 7340 7264
Anti Terrorist Hotline:	0800 789 321
Ofsted (England):	0300 123 1231

Each physical centre will record their own local telephone numbers for:

- Children's Social Care Referral /MASH (Normal Hours)
- Children's Social Care (Out of Hours Emergency Duty Team)
- Safeguarding Allegations against staff - Local Authority Designated Officer (LADO)

Our Online Explore at Home Communities serve children around the UK and if the safeguarding lead needs to call for support or make a referral because they are concerned about a child, they will conduct a web search to find the phone numbers for the local authority for the borough in which the child resides.

GUIDELINES FOR MANAGING CHILDREN

These guidelines are to be followed by ALL members of staff to help children feel safe, understood and ready to learn and to ensure we respond to behavior with consistency and curiosity.

The centre and community managers have specific Behaviour Management responsibility.

This policy works in conjunction with our Safeguarding, Incident and Accident Policies.

Challenging behaviour is often a response to a situation, or when a child is craving attention. If children are occupied, understood, feel safe and are supported with regulation then behavioural incidents are reduced.

Staff use The PACE Model to support children to regulate behaviour through:

- **Playfulness**
  Bring warmth and genuine enjoyment to every session, not just when it's going well. Build a positive atmosphere.
- **Acceptance**
  Unconditional positive regard for the child as a person, separate from their behaviour. They are not unacceptable as a person even if they have demonstrated behaviour of concern. This builds safety
- **Curiosity**
  Respond to behaviour as communication, not as a problem to be managed. Find out what is triggering the behaviour. This builds understanding.
- **Empathy**
  Communicate that you can see what they're going through and you're not frightened by it. Keep verbal and non verbal language calm to prevent escalation of behaviour. This builds connection.

Whilst it is important to clearly communicate what positive behaviour you want to see and this may prevent behaviour from escalating, you will not be able to reason with a child who is fully dysregulated. So, help them to return to a regulated baseline before discussing an incident and any next steps.

In-person tutoring

If a child's behaviour has been dysregulated during their time in the centre, the Centre Director, Assistant Director or On-Call Supervisor will speak with the parent/guardian when they come to collect the child, notifying them of what happened, how the situation was handled and the outcome. It may be more appropriate to speak to them privately about the circumstances rather than in public at the gate. If the child is leaving the centre on their own, the Centre Director, Assistant Director or On-Call Supervisor will notify the parent/guardian by telephone. Details of the event will be recorded in the centre's Compliance Incident Record Folder on One Drive.

If a child is so significantly dysregulated that the safety and wellbeing of themselves, other children or staff cannot be maintained, (i.e. causing excessive harm to other children, staff or property), the Centre Director, Assistant Director or On-Call Supervisor reserves the right to telephone the parent/guardian and ask them to remove the child.

Where a child presents with individual Special Educational Needs and/or a disability, reasonable adjustments will be made to child management procedures as may be appropriate in the circumstances. (See also the Disability, Special Educational and Additional Needs Policy).

Online tutoring

If a child's behaviour has been dysregulated during time in their online session, the Tutor will speak with the parent/guardian at the end of the session. If the behaviour is deemed significantly dysregulated e.g. a complete refusal to work, turning off their equipment, endangering other children in their home, continually using inappropriate language to staff and other children in group sessions etc., a Community Manager will be informed and may call the

parent/guardian during the session.

If tutoring is being delivered in partnership with a school either in person or online, Explore staff will make the teacher aware of any issues and how they were managed.

Where relevant to the setting, Explore Learning staff will:

- Always remain positive when dealing with a child – praise and encourage them, make them feel good about what they're doing and help them to see achievement rather than failure.
- Take the time to listen to children and record any problems they are having.
- Speak quietly and calmly to the child, and speak with the child at their own level, even when encountering difficulties with that child.
- Whilst every effort should be made to prevent such situations arising, a member of staff may restrain a child using the minimum and appropriate amount of force. This could be if a child is behaving physically in an inappropriate manner which may harm the welfare of others. Staff will lead them to a seat, sit them down, help them to regulate first, then discuss the situation calmly. Restraint should only be used if it is the only practical means of securing the welfare of the child or preventing harm to others. Refer to 'Physical Restraint Policy' for more guidance.
- Where a child is displaying behaviour of concern that must be addressed, ensure they understand their behaviour is not appropriate. Help them understand that by being disruptive they are spoiling not only their own, but other children's experiences and that this is unfair. Help older children to see that they need to lead by example. Encourage them to take a mature attitude, deciding independently how to behave themselves, rather than having to be told by a member of staff. In online group sessions it may be necessary to arrange a meeting with a parent/guardian present, outside of a group session to discuss this.
- If a child uses inappropriate language, make it clear that this is not accepted as it can upset and offend other staff and children. Please refer to our equal opportunities policy if a protected characteristic has been abused.
- Where a child is bullying, or being mean to another child, deal with the situation immediately making it clear that such behaviour is unacceptable. Manage the situation so that the bully and the child being bullied are dealt with appropriately as two separate individuals; give support to both. Explain that Explore Learning is a place where children have the opportunity to come and have fun, make new friends and work together, not a place to be unpleasant to others.
- Where a child is getting stressed or upset with their learning, help them to see their achievement in terms of the long-term rather than the immediate.
- Where a child is destructive towards the equipment or facilities at Explore Learning, make it clear that such behaviour is inappropriate and disrespectful.
- Staff are not permitted to physically chastise members or use the threat of corporal punishment as a means of controlling behaviour.
- Staff may use behaviour agreement contracts and concentration charts with a member, alongside parents/guardians to monitor and improve their behaviour.
- In some instances where a child's behaviour is continually disruptive to others' membership and cannot be managed effectively using the above guidelines, they may be asked to leave either temporarily or indefinitely. The child risk assessment form will be used to assess and review this.

Serious incidents that involve injuries to the child, another person, including children or staff must be recorded in an electronic Incident Report, saved in the One Drive Compliance folder, and reported centrally to the company's Central Safeguarding Team. Electronic record forms should be used for reporting and shared with confidentiality.

PHYSICAL RESTRAINT POLICY

Definitions

Restricted physical intervention is 'the use of force to control a person's behaviour'.

The term 'reasonable force' covers the broad range of actions that involve a degree of physical contact to control challenging behaviour. Force is usually used either to control or restrain. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable', in these circumstances, means using no more force than is needed.

Policy Aims:

- To protect every member of staff, visitor and child attending from harm
- To protect all attending children from unnecessary physical intervention
- To provide staff with appropriate training to deal with challenging behaviour in violent or potentially violent situations

This policy on physical restraint should be read in conjunction with our Guidelines for Managing Children, and Safeguarding policies.

Use of Restraint

Physical centre staff must only ever use physical force against a member in exceptional circumstances. Should staff need to intervene with restraint, they should be clear about why it is necessary, and that any actions taken were reasonable, proportionate and in the child's best interest.

Failure to physically restrain a member who is subsequently injured or injures another, could, in certain circumstances, lead to an accusation of negligence.

Staff at Explore Learning will only ever use restraint:

- To avert danger by preventing or deflecting a child's action or perhaps by removing a physical object, which could be used to harm them or others
- If a child appears to be unable to exercise self-control of emotions and behaviour

If it is necessary to restrain a participant because they are in immediate danger to themselves, others or property, Explore Learning staff will:

- Use minimum force for the shortest amount of time
- Remain calm and get the attention of another member of staff
- Record the incident in writing, with a witness statement (where possible), immediately afterwards
- Notify the parent/guardian as soon as possible afterwards or when they come to collect the child

Restraint should only be used if it is the only practical means of securing the welfare of the child. Explore Learningstaff will never use physical punishment or threat of physical punishment.
When using reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities, mental health or medical conditions, staff should in considering the risks carefully recognise the additional vulnerability of these groups. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, staff can reduce the occurrence of challenging behaviour and the need to use reasonable force.

REGISTRATION, DEPARTURE, NON-COLLECTION, LOST CHILD, SICK CHILD, ACCESS AND CENTRE CAPACITY PROCEDURES

Registration Procedure

Where children are being tutored at one of our physical centres, the parent/guardian should bring their child/children into the centre's reception area. They will be met by a member of staff, who will register the child's arrival on the company membership database, before they are permitted entry to the centre.

Once registration is complete, the member of staff will let the child into the centre through the gate, ensuring it has been closed behind them, direct the child to their learning zone and equip the child with the necessary materials for their session. The staff member will notify the parent/guardian what time to collect their child, and then they should leave the centre. If the parent/guardian is not present, the above procedure should be followed in regard to the child and staff.

Departure Procedure

On leaving the centre, the child will be electronically signed out on the company membership database to record accurate times of attendance.

Upon enrolment of their child for tutoring in one of our centres, the parent/guardian is required to provide details of anyone with parental responsibility and anyone who is authorised to collect their child at the end of their session. **Only individuals aged 16 or over are permitted to act as pick-up person for a child.** If the parent/guardian does not provide any names, then only that parent/guardian will be allowed to collect the child.

A parent/guardian may only give permission for their child to leave the centre at the end of their session independently if the child is aged 8 years or over in line with Ofsted VCR requirements. This must be recorded on our membership database when joining. If consent is provided or withdrawn at a later date, this must be confirmed in writing/email and updated on the database. Explore Learning advises children are in secondary school and carry a mobile phone if arriving/leaving unaccompanied. Children leaving unaccompanied should leave at the end of their completed one hour session.

These rules also apply to children leaving the centre for a break between two sessions. Explore Learning can take no responsibility for children outside of the centre if leaving or arriving unaccompanied. Children leaving the centre for any other emergency reason, such as an evacuation, must always be accompanied by an over 18 yr old DBS/PVG vetted member of staff.

If a child is to be collected, Explore Learning will keep them within the centre until the parent/guardian or nominated person arrives in the reception area, where they will be greeted and identified by a staff member, before collecting the child. Anyone not known to the team must have been given permission by a legal parent/guardian, ideally in writing, which will have been recorded on the membership database. Changes to those with parental responsibility or emergency contacts can be made in the future, but must be advised by the parent/guardian, ideally in writing, and recorded on the membership database.

On enrolment the parent/guardian is also required to provide a password for collection and security purposes. If the person collecting a child is known to the team, they are not required to ask for this password. If a person asks to collect a child who is not known, staff will check the pick-up permission list to see if they have permission to collect the child, ask for photo ID to confirm they are who they say, and request the security password. If they are not listed, centre staff will call the parent/guardian and ask to confirm who has been sent to collect the child and ask both parent/guardian and the pick-up person to confirm the password. If this cannot be done, the child will not be permitted to leave until a nominated person on the list can come to collect them.

If there is a police or court order in place to prevent visitation/contact of a child by a parent/guardian, the family are required to inform the management team as soon as possible, and provide evidence to prevent a child being released

to a parent/guardian without authority. These will be securely recorded in a Parental Responsibility and Access Care Plan, in the centre's One Drive Compliance folder.

If parents separate, Explore Learning will require parents to confirm their agreed contact/pick up arrangements, or obtain a court order and provide a copy of this to Explore Learning so that we can observe the arrangements in that court order.

On leaving the centre, all staff take responsibility to conduct a thorough sweep of the entire centre and any additional rooms to ensure all children have departed.

Child Non - Collection Procedure

In the instance that a child within our care at one of Explore Learning's physical centres, who is not permitted to leave our care independently, is not collected within 45 minutes of their expected collection time or by closing time (whichever occurs sooner), the following action should be taken.

- Telephone the parent/guardian, if they can not be reached, contact a person on their pick-up permission list.
- If the parent/guardian or any permitted pick-up contacts cannot be contacted, telephone the **Children's Social Care,** who are trained to support the child and help them cope with their vulnerable position. They may direct staff to contact the Police.

Lost Child Procedure (as per Keeping Children Safe in Out of School Settings)

In the instance of a finding that a child within our care at one of Explore Learning's physical centres is missing and unaccounted for, actions should be taken in the following sequence, until the child is located:

- Immediately inform the Safeguarding Lead and other staff members.
- Conduct a thorough search of the centre. Check that the child has not been signed out/collected. Then proceed to search outside the centre.
- Where applicable, inform Sainsburys/Tesco/shopping centre staff at the Customer Services Desk and request a tannoy announcement, requesting that parent/guardian come into the Centre. A tannoy announcement declaring a child is missing will not be made in case of further risk to the child.
- If the child has not been found once the centre and store/outside area has been searched, telephone the parent/ guardian. If the child was attending in partnership with a school, the accompanying teacher would have the contact details and contact the parent/guardian.
- In most cases, parents and carers know the child best and will be able to assess whether their child is likely to return of their own accord, or whether there are significant concerns for their safety, in which case the Police she be called.
- If the child is 5 or under, always call the Police.
- The parents or carer are responsible for contacting the police on 999. You can contact the police on their behalf if they agree. If you or the parents contact the police, wait for them to arrive and follow their instructions.
- The Safeguarding Lead or a senior staff member must continue to search while waiting for the police to arrive.
- If the parents do not want to contact the police, only contact them if you consider the parent's decision to be unreasonable and the child is at significant risk of harm.
- Complete an Incident Report.
- Report to the company's Central Safeguarding Team, who will support the centre team investigate and review what measures could have been taken to prevent the incident.

Sick Child Policy and Procedure

At the initial registration process all parents/guardians agree to adhere to a Membership Agreement, which states:

- In an emergency, our staff may administer necessary emergency advice or treatment to your child/ren. Staffwill attempt to contact you in the event of an accident or emergency, but if we are unable to do so, we will need to take the necessary action. If it is necessary for a child to remove clothing for first aid treatment, therewill, wherever possible, be another adult present.
- Please do not bring your child to the centre if they are ill or infectious. Staff will adhere to guidelines from https://www.nhs.uk/Livewell/Yourchildatschool/Pages/Illness.aspx, stating that children should not attend

sessions:

- For 24 hours after they begin to feel better from a cold, cough sore throat or raised temperature
- For 48 hours after symptoms of vomiting and diarrhoea have ceased

In the instance of a child becoming ill whilst attending an Explore Learning centre, actions should be taken in the following sequence:

1. Immediately inform the Centre/Assistant Director or On-Call Supervisor - qualified in Paediatric First Aid.
2. Assess the child's needs and treat accordingly. Check the child's membership records for details of any medical needs, stored medication and Emergency Medicine and Treatment Permission Form.
3. If required, immediately call emergency services on 999 and request an ambulance.
4. Telephone the parent/guardian to inform them of the incident, if the emergency services have been called, or if we need them to collect the child.
5. Explain on collection the child's symptoms, how we responded, and any treatment given.
6. If medicine is administered (including self-administration) staff must complete an Administration ofMedicine Form and give a copy to the parent/guardian.

For details on administration of medicine/treatment please refer to our Storage, Handling and Administration of Medicine/Treatment Policy.

If the child was attending in partnership with a school, the accompanying teacher would have the necessary medical information, contact details, and would contact the parent/guardian.

In the instance of a child becoming ill whilst attending an online tuition session, actions should be taken in the following sequence:

1. Immediately inform Community Lead/Centre Manager to alert the parent/guardian and check the child's membership records for details of any medical needs.
2. If required, immediately call emergency services on 999 and request an ambulance.
3. Telephone the parent/guardian to inform them of the incident if they are not at home.
4. Explain the child's symptoms and how we responded.

Access and Supervision

Staff and all visitors to Explore Learning's physical centres must sign in and out with the time when entering and leaving the centre in our Staff and Visitor Log. This is to safeguard our members and for use as a register in an emergency centre evacuation. When visiting schools, staff must sign in/out of the school as visitors.

Staff under the age of 18, and all visitors, to Explore Learning's centres must be supervised within the centre at all timesby a member of staff aged18 or over who holds an enhanced DBS/PVG/NI Access check.

Owing to our safeguarding and Ofsted requirements, the toilets at Explore Learning's centres are solely for the use of our members and staff when they are within the centre, and are not accessible for public use. Relatives of members may be allowed to use the toilets if they are attending a meeting in-centre, providing they are accompanied to and from the bathroom at all times by a member of staff. Relatives of members accompanying a member to the centre may be permitted to use the toilet, but only if it is an emergency and no other toilets are available nearby e.g. in Sainsburys/Tesco/nearby café/library etc, providing they sign in/out of the centre and a member of staff is available to accompany them to and from the bathroom.

Animals and Pets

Animals are not permitted in our physical centres except registered assistance animals.

Centre Capacity

Explore Learning maintains a capacity limit of children within their physical settings at any one time to ensure children can be cared for safely. The maximum capacity is calculated by the number of seats in zones alongside the number of seats in our collaborative area (formally Surf Club). The number of children on site is managed as all sessions are booked.

This number is displayed within the centre on the Emergency Numbers Poster in the office.
Staff can quickly see how many children are in the centre at any time on our membership system where children are signed in and out on arrival and departure.

If a child arrives at one of our centres alone, and they do not have a scheduled session, they should be bought into the centre for safety and the parent/guardian contacted immediately.

ENVIRONMENTAL POLICY STATEMENT

This is the Environmental Policy Statement of Explore Learning Ltd.

Explore Learning calculates its GHG emissions on an annual basis, covering all scopes of operations. We are committed to reducing these emissions year on year and ultimately achieving Net Zero in the future. We recognise that we have a responsibility to our members and wider society to foster the preservation and protection of the environment.

As part of our Sustainability and Net Zero strategy, it is our policy to:

- Conserve energy through minimising consumption and maximising efficiency
- Implementing waste and recycling systems in our centres, so that waste can be recycled as much as possible
- Minimise the extent of environmental impacts on operations within the organisations sphere of influence
- Minimise the use of materials, which may be harmful to the environment
- Recognise and encourage the contribution every employee can make towards improving environmental performance
- Encourage green methods of travel for business travel and commuting
- Put in place procedures and support information that enables compliance with the law, regulations and codes of practice relating to the environmental issues

For more information about our plans, you can read our Net Zero GHG Emissions and Reduction Plan which is published on our website.

COMPANY HEALTH AND SAFETY POLICY STATEMENT

Based upon Health and Safety at Work Act 1974

This is the Health and Safety Policy Statement of **Explore Learning Ltd.**

Explore Learning is committed to providing a safe environment for workers, children or any other visitors to Explore Learning centres and communities. The safety procedures in operation are for the protection of people who work at or visit the organisation's premises and compliance with these procedures is mandatory.

Explore Learning Ltd. Statement of General Policy is to:

- Provide adequate control of the health & safety risks arising from our work activities
- Consult with our employees on matters affecting their health & safety
- Provide & maintain safe plant and equipment
- Provide information, instruction and supervision for employees
- Ensure all employees are competent to do their tasks and to provide them with adequate training
- Prevent accidents and cases of work related ill health
- Maintain safe and healthy working conditions
- Review and revise this policy as necessary at regular intervals

In order that the organisation can achieve these objectives, it is important that all Board Members, Directors, Officers, Employees and Contractors recognise their legal duty, whilst at work, to take reasonable care for the health and safety of themselves and of other persons. Employees should also co-operate fully with the organisation, or anyone else concerned, to ensure that their Health and Safety obligations are discharged.

Explore Learning's Public and Employee Liability Certificates are displayed on the Company website and intranet.

Explore LEARNING

HEALTH AND SAFETY POLICIES AND PROCEDURES

The following document details health and safety policies and procedures specific to the Explore Learning Centre.

Responsibilities

1. Overall responsibility for Health and Safety is that of the CEO.
2. The day-to-day responsibility of ensuring this policy is put into practice is delegated to the Centre Director.
3. In the absence of Centre Director, day-to day responsibility will be delegated to either of the AssistantDirectors or On-Call Supervisor.
4. All employees are personally responsible for health and safety within the Centre and should:
    a. Co-operate with the Centre Director/Assistant Directors/ On-Call Supervisor on health and safety matters.
    b. Take reasonable care of their own health and safety and that of the children in their care.
    c. Not interfere with anything provided to safeguard their health and safety and that of the children in their care.
    d. Report any concerns over health and safety to the Centre Director without delay.

Health and Safety Risks Assessments

1. The Centre Director will carry out regular risk assessments of the Centre.
2. The findings of the risk assessments will be reported to the Facilities Manager, who should take appropriate actions to rectify all faults.
3. The Facilities Manager will approve any action required to remove or control risk.
4. The Centre Director will be responsible for ensuring that all actions are implemented.
5. The Facilities Manager will check that the implemented actions have removed and/or controlled the risk.
6. Risk assessments will be reviewed annually or when work activities change, whichever occurs first.

Safe Plant and Equipment

1. The Centre Director will be responsible for identifying all equipment needing maintenance.
2. The appropriate head of department will be responsible for ensuring effective maintenance procedures are drawn up.
3. The Centre Director will be responsible for ensuring all identified maintenance is implemented.
4. Any problems found with equipment should be reported to the Centre Director without delay.
5. The purchaser will check that any new equipment meets health and safety standards before it is purchased.

Safe handling, storage and use of substances

1. The Centre Director will be responsible for identifying all substances used at the centre, which require aCOSHH assessment (*Chemicals or Substances Hazardous to Health*).
2. The Centre Director will be responsible for undertaking COSHH assessments.
3. The Facilities Manager will be responsible for ensuring that all actions identified in the assessments are implemented.
4. The Centre Director will be responsible for ensuring that all relevant employees are informed about COSHH assessments.
5. All purchasers will check that new substances can be used safely before they are purchased.
6. Cleaning products will be stored in a cool environment, in a locked cupboard or shelf out of reach of children.
7. Assessments will be reviewed annually or when work activities change, whichever is sooner.

Information, Instruction and Supervision

1. The Health and Safety Law poster is displayed in the Centre office.
2. Health and Safety advice is available from the Centre Director, Performance Manager, Facilities Manager and CEO.
3. Supervision of part-time staff and trainees will be arranged, undertaken and monitored by the CentreDirector.
4. The CEO is responsible for ensuring that employees working at locations under the control of otheremployers are given relevant health and safety information.

Health and Safety training

1. Explore Learning ensures all staff receive induction H&S training. This is refreshed annually.
2. The Centre Director will arrange any job specific training as required.
3. All Centre Managers and On-Call Supervisors undertake Paediatric First Aid training prior to working alone.
4. Staff training records will be kept centrally and updated by the individual.
5. The Centre Director will identify, arrange and monitor any training requirements.

Accidents & First Aid

1. The first aid box is kept in the centre with a sign indicating its location; it contains a replenishment log.
2. The Managers will attend Paediatric First Aid training every 3 years, as well as liaising with Sainsburys/Tesco's Appointed First Aiders (where applicable). A First Aid trained Manager/Supervisor must be on site at all times.
3. All accidents are recorded in the Accident Folder which is kept in the Centre and updated by the Centre Director, Assistant Directors and On-Call Supervisors.
4. Explore Learning's Head of Property is responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) to HSE, the Head of Ofsted & Safeguarding will notify the enforcing authority, Ofsted.

Monitoring

1. A daily Centre check will be conducted by the Centre Director, Assistant Directors or On-Call Supervisor.
2. The Centre Director is responsible for investigating accidents.
3. The Centre Director is responsible for investigating work related causes of sickness.
4. The Centre Director is responsible for acting on investigation to prevent recurrence.
5. The Centre Director is responsible for reporting accidents and near misses to the Facilities Manager and Explore Learning's Central Safeguarding Team, to be recorded on the Central Incident Register.

Emergency Procedures

1. The Centre Director is responsible for ensuring the Fire Risk Assessment or Annual Reviews are undertaken and any actions implemented.
2. The Centre Director is responsible for checking escape routes. Where based inside a supermarket, they willalso be checked by a Sainsburys/Tesco's representative.
3. The Centre Director is responsible for checking fire extinguishers weekly.
4. Annual servicing to the fire extinguishers will be carried out by the supplier.
5. Fire Alarms are tested weekly and Emergency Lighting is tested monthly. Both are recorded in the Fire Log unless they are conducted by Shopping Centre or Supermarket management.

No Smoking Policy

Smoking, electronic cigarettes and vaping is forbidden anywhere on, or in close proximity to the centre premises. It is the responsibility ofthe Centre Director to ensure that suitable signage is visible to the public, and staff are aware of the company policy. Staff are not permitted to smoke or vape in online sessions either.

Reporting

Serious H&S incidents or accidents must be written up in an Incident or Accident Report and reported centrally to Explore Learning's Facilities Manager and Head of Property within 24 hours of the event. Electronic record forms should be used for reporting and shared with confidentiality.

INFECTION CONTROL POLICY

Explore Learning promotes the general wellbeing and health of all children and ensures the risk of infection is minimised amongst all children and staff.

We ensure that:

- Upon registration for tuition, all parents/guardians agree within the Membership Agreement they will not bring their children to the centre if they are unwell or infectious. If they have not attended school that day, they should not access the physical setting.
- Staff do not come into work if they are unwell and will inform management if they become unwellduring a shift.
- All incubation periods for illnesses are checked by staff through NHS Direct and using exclusion guidelinesfor schools.
- Good hygiene practice signs are displayed within the centre.
- Antibacterial hand gel is available on reception; staff encourage visitors to use upon entry.
- To wipe down all surfaces using antibacterial cleaning products (keyboard, mouse etc) after everyuse. Centre staff are to inform the Facilities Manager if they are running low on stock.
- All bins in our centres contain bin liners.
- All staff actively encourage the children to regularly wash their hands to maintain good hygiene practice.
- Antibacterial soap and hand driers are provided in our centres' toilet facilities.
- Tissues are provided in all areas of the centre.
- A water fountain or water dispenser with individual disposable cups are used for drinking water in ourcentres. Glug Glug Glug water fountains should now have installed swan necks, to fill up bottles.
- All members should be encouraged to bring in their own water bottles which can be filled at the water fountain.
- Staff ensure the centre is cleaned daily; and equipment which is used by children on a regular basis iscleaned appropriately.
- During periods when children are present on site in our centres, visitors and members are not allowed to bring in or consume food on site, unless for medical reasons. We will only provide drinking water.
- Staff should be aware of colleague and member allergies, and prevent any foods which could put others at risk being brought in or consumed on site.
- Animals are not permitted on the premises, unless an assistance animal is required.
- Staff notify parents/guardians and Ofsted if there is spread of infection in the centre amongst children orstaff.
- In the event of having to dispose of clinical waste, we would consult the Environment Agency to complywith correct guidelines.

Serious incidents must be written up in an Incident Report within 24 hours of the incident and reported centrally to Explore Learning's Central Safeguarding Team. Electronic record forms should be used for reporting and shared with confidentiality.

FIRE AND EVACUATION POLICIES & PROCEDURES

Management Responsibilities

It is the Centre Director's overall responsibility to:

- Ensure all staff are familiar with Explore Learning's Fire Safety Policies and Procedures.
- Ensure all firefighting equipment on the premises is correct, sufficient and in good working order.
- Conduct fire alarm and emergency lighting tests, evacuation drills and training on a regular basis, and record in the Fire Log.

The Assistant Directors or On-Call Supervisor will assume responsibility when the Centre Director is absent. All staff maintain a day to day responsibility for fire safety. In the event of a fire procedures should be followed as outlined.

Staff Training

Explore Learning ensures all staff receive induction fire training. All staff also attend Sainsburys/ Tesco/ shopping centre fire training to stay aware of store policies and store fire call points, emergency exits and evacuation routes (where applicable). This training is refreshed annually, as well as conducting Fire Drills at least twice a year.

Fire Risk Assessment

Every centre has a Fire Risk Assessment conducted at its launch, which is reviewed on an annual basis by the Centre Director who acts as the competent person and every third year by an external consultant. Action points are set out clearly with a time frame to be completed.

Equipment

In accordance with the local authority Fire Inspector the centre is equipped with:

- Member attendance records held electronically
- Staff & Visitors Log
- CO2 and Hydro Spray Fire Extinguishers
- Emergency Exit signs
- Emergency Evacuation posters
- Fire Log
- First Aid box

Notification of Procedures to Parents/Guardians and Children

Parents/guardians are notified of the evacuation procedures in the event of a fire on a poster in Reception.

Emergency Evacuation Procedure posters are displayed in the centre and Reception, including the Fire Meeting Point location. All fire related incidents must be written up in an Incident Report and reported centrally to the Facilities Manager. Electronic record forms should be used for reporting and shared with confidentiality.

Staff Ratios

Our high staff to child ratios allow us to safely and efficiently evacuate the centre as our staff are able to manage small groups of children, with one of the managers coordinating an evacuation.

Evacuation Exits and Routes

The managers will ensure these routes are always clear from obstruction, well-lit and lead directly to a point of safety with a clear path to the Evacuation Meeting Point.

Assisting Children or Staff in a Centre Evacuation

Upon enrolment at the centre, a Manager will discuss any additional needs a child may have with the parent/guardian, or with the staff member directly, and assess if extra procedures need to be put in place for them in the event of an evacuation, such as for a temporary/permanent, physical, medical, visual or auditory impairment.

Where applicable, a Personal Emergency Evacuation Plan (PEEP) will be developed by the manager in consultation with the parent/guardian or staff member. The plan will include details of the action to take in the event of an evacuation and outline the requirements of the person e.g. ability to independently reach the safety of a protected escape route or exit, or if require support from staff.

Should the centre be based above ground floor level, in the event of an emergency evacuation, children and staff will have access to an evacuation chair, which trained members of staff will use to safely evacuate them out of the centre and to the Evacuation Meeting Point, as outlined in their PEEP

EMERGENCY EVACUATION PROCEDURES

IF YOU DISCOVER A FIRE

Children: Alert a member of staff

Tutors: Operate the fire alarm, at the nearest and safest point, by the appropriate method
Alert other staff to start evacuating themselves and their children
Do not take any unnecessary personal risks
Close any doors/ windows if it is safe for you to do so
Evacuate the building. Do not attempt to extinguish the fire unless trained to do so.

CALL THE FIRE BRIGADE

ON HEARING THE ALERT ALARM i.e. intermittent alarm

Children: Listen to your tutor

Tutors: Prepare to begin evacuation
Ensure children DO NOT leave the centre unaccompanied i.e. to find parents/guardians
Evacuate the premises calmly and safely

EVACUATION PROCEDURE

Children:

Stay calm
Listen to your tutor
Stay with your tutor and follow their instructions
Evacuate via your nearest fire exit to the fire assembly point

Tutors:

Evacuate children through the nearest fire exit in an orderly fashion
Take responsibility for the children in your area
Escort children to the fire assembly pointDo not let children leave unaccompanied

Manager:

Collect centre iPad to access company membership database for records of children on site, Staff/Visitor Attendance Register and a phone.
In the event theiPad is not available, take the centre laptop.
Conduct full and final check of premises to ensure empty i.e. toilet, storage rooms, all zones and proceed to fire assembly point

AT FIRE ASSEMBLY POINT

- Call an Attendance Register for members, staff and visitors on arrival at the assembly point.
- Notify the Fire Brigade if anyone is not accounted for.
- Await further instruction from Fire Brigade.
- Do not return to the building unless instructed to do so by the Fire Brigade.
- If you are not permitted to return to the centre, children must be 'signed out' on the company membership database before parents/guardians are permitted to take children home.
- Notify Central Team – Parents/guardians can be informed via text message from the Customer Experience Team or staff phoning them directly.
- You can use the company membership database on the iPad to contact parents/guardians to collect their children.
- Details of the evacuation must be recorded in the Fire Log on return to the centre.

COUNTER TERRORISM POLICY AND LOCKDOWN PROCEDURES

Policy Statement

This policy is to enable staff to recognise and report suspicious activity, and to understand what action should be taken in the unlikely event of such an incident.

Management Responsibilities

It is the Centre Director/Tutor Performance Team's overall responsibility to:

- Ensure all staff undertake safeguarding training to include awareness of The Prevent Duty, recognising the signs and symptoms that a child may be at risk from radicalisation, how to protect children from terrorism or extremism, and where to report concerns.
- Provide stability in the lives of children who may be at risk of radicalisation.
- Recognise that members can be vulnerable and exploited by others.
- Be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination. For further information see the Safeguarding Policy and Safeguarding Procedures.
- Act as the first point of call for any child, staff, or parents/guardians who believe that a child or any staff member is at risk of radicalisation.

Making a Referral

Explore Learning's Central Safeguarding Team, as Senior and Deputy Designated Safeguarding Officers will advise and act upon all suspicion, belief and evidence of all reported cases of radicalisation.

Staff may also contact the **Anti-Terrorist Hotline on 0800 789 321** for advice or to report suspicions or concerns.

Measures Taken to Aid the Prevention of Radicalisation

Staff Checks

- All staff are subject to vetting checks before they can commence work at Explore Learning. For furtherdetails, refer to 'Staff Recruitment, Support and Training' within the Safeguarding Policy and Safeguarding Procedures.

Information Security

- For further information on filtering of websites containing radicalised or extreme material please refer tothe ICT Security Management Policy.
- Confidential waste is disposed of safely and securely to prevent access to data.

Centre Security Measures

- External doors should not be propped open.
- If a staff member loses their keys or security alarm fob, the Facilities Manager must be informed immediately.
- Centre staff including Managers and Tutors in stand-alone settings receive training in their Health and Safety Module on how to use and reset their panic alarms which are linked to the Police. Those who do not have panic alarms know to call 999 in an emergency. Each team should have a safe word or phrase to support indicating to staff that they need them to press the panic alarm.
- Centre staff in Sainsburys/Tesco/shopping centre based settings are familiar with their store security team, and how to contact them in the event of a concern or emergency.

Actions to be Taken in the Event of a Terrorist Threat or Attack

Suspicious Mail or Deliveries

Staff should be aware of any post that they receive to the centre. Deliveries could be explosive, incendiary, chemical, biological or radiological. If a suspicious parcel is found or received, the centre should be evacuated as per guidelines in the Emergency Evacuation Policies & Procedures, and a report made to the Police immediately.

Suspicious Items

Centre staff are best placed to identify an item which is 'not right'. In the event that a suspicious item is found, the centre should be evacuated as per guidelines in the Emergency Evacuation Policies & Procedures, and a report made to the Police immediately. The item must not be touched.

Bomb Threat

If a bomb threat is made against the centre, the centre should be evacuated as per guidelines in the Emergency Evacuation Policies & Procedures, and a report made to the Police immediately.

Lockdown Procedures

In the unlikely event that a centre evacuation will put children, staff and visitors at more risk from an impending attack, the centre will go into Lockdown, following the below procedures:

- Lock external doors and windows (if safe to do so)
- If it is unsafe to leave the centre, grab a phone, find cover and hide
- Press panic button (where available) or if possible, call 999 immediately
- Lock or barricade yourself and attending children into the centre toilets/storeroom/cupboard/office
- Remain still and silent – ensure mobile phones are silenced
- Keep calm – this will help children in your care to do the same
- Don't look for any potential intruders/attackers - if you can see them, they might see you
- Be aware of your exits, should you need to escape quickly
- Await further instruction - the Police will evacuate you when it is safe to do so
- Follow any instructions issued to you by the Police

Incidents must be written up in an electronic Incident Report and saved centrally to the centre's One Drive Compliance folder. Electronic record forms should be used for reporting and shared with confidentiality.

ACCIDENT POLICY

Explore Learning has a commitment to the safety and wellbeing of the children, staff, parents/guardians and visitors who visit our centres. Our Accident Policy is designed to ensure that any accident that takes place within one of our settingsis dealt with appropriately. This policy works alongside our Behaviour Management and Incident policies.

Pre Existing Injuries

An Accident Record should also be made if a child comes to a session with an existing injury, enquiries should be made about how and when it was obtained.

Accidents on our Premises

Explore Learning's Head of Ofsted and Safeguarding will notify Ofsted of a serious injury or death to any child in our care or an adult on our premises.

Each Explore Learning Centre has a Paediatric First Aider, First Aid Box and online Accident Records. Where an accident takes place within an Explore Learning centre, the following procedure will take place:

1. As soon as accident is apparent, alert the first aider and a senior manager immediately.
2. Prioritise treating of the injured person. This may involve calling 999.
3. A detailed electronic Accident Record will be completed.
4. If the accident involves a child, the parent/guardian will be notified at the earliest opportunity. If the accident is minor and no serious injury has been sustained the parent/guardian will be notified at the time of the collection of the child (where applicable), otherwise will be called immediately after the accident.
5. If the accident involves a child, the parent/guardian will be given a copy. Ifthe accident involved an adult, they will be given a copy. The first aider will advise on whether the injured party should seek further medical attention.
6. The centre management will then call the parent/guardian of a child, or the individual, if an adult, later that evening or the next morning to see how the injured party are doing.

Where an accident takes place, it will be reported on an electronic (editable PDF) Accident Record and stored in the centre's Compliance Accident Folder on One Drive. The following will be recorded:

1. date, time and location of accident occurrence
2. name of the person(s) injured.
3. name(s) of the staff reporting the accident.
4. a detailed account of the circumstances of the accident: type of accident, how it happened and what furniture/equipment/people were involved.
5. a description of any injury sustained (type, size and location on the body). A note should also be made if no visible injury or wound is visible.
6. what actions were taken and by whom e.g. First Aid administered, ambulance called etc.
7. details of how the parent/guardian (members/visitors only) was informed.

A copy of the accident report must be shared (emailed or in person) to the parent/guardian of the child involved or to the adult to whom the accident happened. If a child has had an accident and has permission to leave the centre by themselves, and is not being collected by a parent/guardian, a manager/on call supervisor will telephone the parent/guardian and notify them of the accident. If the child has been involved in an accident, and the staff do not feel it is appropriate for the child to leave on their own, they will call the parent/guardian and ask them to collect the child.

Serious Accidents or those requiring hospitalisation must be written up and reported centrally to Explore Learning's Central Safeguarding Team and the Facilities Manager. Electronic record forms should be used for reporting and shared with confidentiality.

Explore Learning's Head of Property is responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) toHSE, the Head of Ofsted and Safeguarding will notify the enforcing authority, Ofsted.

INCIDENT POLICY

Explore Learning is committed to the safety and wellbeing of children under the care of our staff. Our Incident Policy is designed to protect our centre and community staff, children, parents/guardians of members and visitors, and ensure that any incident is dealt with appropriately. This policy operates alongside our Behaviour Management, Safeguarding and Accident Policies.

Explore Learning defines an 'incident' as any incident causing concern for the welfare of a member of staff, child, parent/guardian or visitor that is not accidental. This may or may not have resulted in an injury, and includes any situation where:

1. any type of safeguarding incident, concern or disclosure occurring in centre or community, outside or online – refer to safeguarding policy and safeguarding procedures
2. a child or adult behaves inappropriately physically or verbally
3. it is necessary to restrain a child physically due to severe or dangerous behaviour
4. an individual attempts to or actually causes deliberate harm to another person
5. an individual abuses another person verbally or in writing
6. a child attempts to escape from the premises or actually escapes from the premises
7. a child is removed from a session without authorisation
8. individuals are unlawfully discriminated against on the basis of their sex, gender reassignment, race, ethnicity, colour, nationality, culture, language, religion, disability, age, pregnancy/maternity, marriage/civil partnership, or sexual orientation
9. staff code of conduct is breached
10. theft, fire, burglary, vandalism, or centre closure
11. This list is not exhaustive – please refer to the Incident Reporting section of the company intranet for further examples of what should be recorded and reported.

Where an incident takes place, the situation will be recorded on an electronic (editable PDF) Incident Record Form and stored securely in the centre or community's Compliance Incident Folder on One Drive. The following will be recorded:

1. date, time and location the incident occurred
2. child's full name, age and home address
3. full name of the member(s) of staff or others involved and their role
4. an account of the incident/disclosure by a member of staff, any children involved, and any witnesses
5. how the incident was handled
6. whether a parent/guardian was informed, who, how and when
7. the outcome of the investigation
8. who else was notified internally, such as Performance Manager, Facilities/H&S, or People Operations.
9. whether the incident required reporting to Children's Social Care/LADO or enforcing authorities, such as Ofsted, and the Police. If not consulted, an explanation as to why this decision was taken should be recorded
10. Which member of Explore's Safeguarding team provided support.

Staff will notify the parents/guardians of the children involved in the incident after the session, or contact them immediately, depending on the severity of the incident. If the incident cannot be reported to the parent/guardian immediately, staff will telephone, or email them if not contactable, to notify them of the incident and that it has been recorded as soon as possible. If staff feel a child may be at risk from harm by doing this, they may decide not share this information with the parent/guardian or their partner, and instead contact the relevant external authority for advice and guidance on howbest to escalate their concern.

Where appropriate, Explore Learning staff will review the child's behaviour with the parent/guardian and the child, where appropriate, and agree the best course of action. This may include implementing a Care Plan, Parental Responsibility and Access Care Plan, Intimate Care Plan, or Child Risk Assessment.
Explore Learning reserves the right to exclude a child from sessions or an Explore Learning centre at any time.

Serious incidents must be written up in an Incident Report within 24 hours of the incident taking place and reported centrally to Explore Learning's Central Safeguarding Team. Electronic record forms should be used for reporting and shared with confidentiality.

Explore LEARNING

POLICY FOR THE STORAGE, HANDLING & ADMINISTRATION OF MEDICINE/TREATMENT

Explore Learning is committed to bringing educational opportunities and benefits to as many children as possible including those with disabilities, special additional needs, special educational needs, and physical and mental health needs.

In the event of an accident or emergency, our staff may seek medical advice and may administer treatment to a child. Staff will attempt to contact a parent/guardian in the event of an accident or emergency but if staff were unable to do so, they will need to take any necessary action.

Whilst Explore Learning has a general policy of not administering any medication to children whilst they attend an Explore Learning tutoring session, Explore Learning recognises that certain children, in certain circumstances, might require the administration of a specific medication or treatment in a life-threatening situation. This includes children with life threatening allergies.

In such emergency situations with the following information and written permission from the child's parents/guardians, a Paediatric First Aid trained member of staff will administer the necessary medication or treatment.

Should staff need to administer the necessary medication or treatment to a child in an emergency or life- threatening situation, the parent/guardian are required to provide:

- **A full written description of the medication/treatment required** on an 'Emergency Medication and Treatment Permission Form' to include: type, name and strength of medication, how the medication should be stored, the dose required, the time and location that medication should be administered and any other relevant information.
- **A relevant medical history for the child** in question with the following information: the name of the child's GP with the address and telephone number of their GP's surgery.
- **Signed parental/guardian consent** on the 'Emergency Medication and Treatment Permission Form', giving permission for a First Aid trained member of staff to administer the named medication or treatment should the need arise. The completed form must be stored in the First Aid & Medicine Folder for easy access.
- **Any medication required** as per the child's medical needs. The parent/guardian is responsible for providing in-date medication and the disposal of out of date medication. Medication must be stored out of reach from children in the centre Medicine Box and must be clearly labelled with the child's name and dosage required ina zip lock bag along with a copy of the completed 'Emergency Medication and Treatment Permission Form'.
- **Any medication provided by the parent/guardian must be signed in/out of the centre using a Handling Medication Form.** Parent/guardians should be advised where possible to provide spare medication to be kept permanently on site and recorded on the Long-Term Storage of Medicine Tracker.

In addition, should the administration of the named medication/treatment require specific training:

- The parent/guardian should either give all First Aid training members of staff the necessary training orarrange for the necessary training to be given.
- A record of these training events will be kept. It is the parent/guardian's responsibility to ensure that Managers are kept up to date with the relevant training to administer the child's medication or treatment in a life- threatening situation.
- When any new First Aid trained member of staff joins the centre team, the Centre Director will notify the relevant parent/guardian to arrange for the new member of staff to be appropriately trained.

Explore Learning will:

- Record children's medical details on our membership database.
- Keep an up to date list of children with severe allergies or life-threatening medical conditions, on display in the office, so all staff know which children are at risk.
- Ensure Emergency Medication and Treatment Permission Forms are also kept in the First Aid & Medicine Folder for easy access.
- Ensure the safe storage of such medicines or life-saving equipment in a clean hygienic storage box in the office out of reach of children. A small fridge can be supplied if medicine requires refrigeration.
- Ensure each medicine is clearly labelled with the child's name, date of birth and dosage requirements in a plastic zip lock bag, with a copy of their Emergency Medication and Treatment Permission Form and will be referred to before any medication is given.
- Contact the parent/guardian of the child should any life-threatening situation arise.
- Ensure that any medication administered is recorded on an Individual Administration of Medicine Form withthe following information:

1. The date and time the medication has been administered
2. The full name of the child being given the medication
3. Information about the child's medical condition and confirmation that staff have permission toadminister medication
4. The medication administered: name, type, dosage and method of administration
5. Any notes of observations
6. The full name and signature of the staff member administering the medication
7. The parent/guardian should also sign the record on collecting the child.

Explore Learning will give the parent/guardian a record of any medication administered to reduce the risk of overdose.

Serious incidents and accidents must be written up in an Incident or Accident Report within 24 hours of the incident and reported centrally to Explore Learning's Central Safeguarding Team. Electronic record forms should be used for reporting and shared with confidentiality.

POLICY FOR THE NOTIFICATION OF INFORMATION TO ENFORCING AUTHORITIES AND OFSTED REQUIREMENTS

Explore Learning Ltd understands its requirements to comply with Ofsted's Voluntary Childcare Requirements in England.

Staff of registered centres must inform Ofsted of the following, no later than 14 days after the change occurs:

- A change to the address, phone number, working days/hours or registration details of the premises where childcare is provided.
- A change in the type of childcare we provide.
- Any change of the Managers or Nominated Person.
- Any change of the Managers or Nominated Person's name, address or telephone number.
- Any significant event which is likely to affect the Managers or Nominated Person's suitability or any person caring for children on the premises, such as any offences or orders that may disqualify them.
- Any changes to people responsible for running the childcare
- Any changes to the people who make up your organization – this includes partners, directors, company secretaries and any other members of the governing body
- Any changes to the name or registered office address of your business
- Changes to the legal structure of the business
- Any serious accident or injury to, or the death of any child while receiving childcare.
- Any serious accident or injury to, or the death of, any other person on the premises on which childcare is provided.
- Any allegation of serious harm to, or abuse of, a child committed by any person looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere),or by any person, where the allegation relates to harm or abuse occurring on those premises.

Ofsted notification forms can be used along with guidance to inform them of such events as detailed above.

Explore Learning are required under the Ofsted Voluntary Childcare Register to communicate details of the registration system for the Childcare Register and Ofsted's address. These are recorded below and on the company website.

Ofsted Registration Requirements: https://www.gov.uk/guidance/childminders-and-childcare-providers-register-with-ofsted/registration-requirements

Ofsted's Address:

Applications, Regulatory and Contact (ARC) Team,
Ofsted, Piccadilly Gate,Store Street, Manchester, M1 2WD

0300 123 1231

MODERN SLAVERY POLICY

Introduction

Explore Learning Ltd takes its responsibilities very seriously with regard to the Modern Slavery Act 2015. This statement sets out the approach taken by the company to understand all potential modern slavery risks related to its business and the actions undertaken to mitigate any such risks.

Organisation Structure

Explore Learning is one of the leading maths and English tuition providers in the UK and operates in 95 physical centres and 5 virtual communities in the UK offering both in-centre and online tuition. Explore Learning's Registered Office address and all of its trading premises are in the UK and the company employs approximately 3000 staff members.

Explore Learning Ltd. statement on slavery and human trafficking

Explore Learning Ltd has a zero-tolerance approach to any form of mistreatment of people and is committed to co-operating and conducting its business in such a way that human rights are respected and protected. We will not permit or condone any form of slavery, servitude, forced or compulsory labour or human trafficking. We recognise that our business has a role to play in managing this issue and we are firmly committed to working to identify and eradicate modern slavery practices from our operations and our supply chains, to the extent that they might exist. Explore Learning employs over 370 salaried employees and over 2400 variable hours employees. All staff must readour full Policies and Procedures on an annual basis and answer a set of questions to check for understanding.

The key policies that support this Modern Slavery policy are:

- Whistleblowing policy
- Recruitment policy
- Code of conduct

As part of our ongoing commitment to eradicating modern slavery from all aspects of our business and supply chains, we have identified the key areas that pose the highest risk. The below areas are not exclusively the only areas of risk, however they pose the highest risk due to the volume and nature of the areas.

These are:

- The recruitment of staff
- The purchase of goods that Explore Learning offers to its members as part of the Reward and Recognition scheme

Responding to these risks

Recruitment

We operate a robust recruitment and employment process. We embrace principles supportive of equal treatment without unlawful discrimination and with the protection of employment law for all staff. We treat all staff equally, without unlawful discrimination and with respect for their human rights. All staff enjoy the protection of relevant UK law in respect of their employment. Explore Learning is legally required to undertake certain documentation checks on every potential employee to avoid employing illegal workers. This policy applies to all new employees of the Company, irrespective of their national origin. Before any individual of any nationality starts work for the Company, itis obligatory that they can prove entitlement to work in the UK.

Document checks

To ensure that all employees are eligible to work in the UK, Explore Learning will ensure that for all new staff, the following must be done:

- For new employees who hold a valid UK or Irish passport, checks are processed via our government-accredited digital identity verification technology (IDVT) service, or by a manual document check of the original passport.
- For any new employee who does not hold a valid UK or Irish passport, their right to work must be verified using the Home Office's online right to work checking service, via a share code provided by the employee together with their date of birth. This online check is the only method that establishes a statutory excuse for this group - a physical document, including an expired Biometric Residence Permit (BRPs were withdrawn by the Home Office from October 2024), is not acceptable evidence on its own.
- Where an employee has an outstanding application, administrative review or appeal with the Home Office and cannot yet provide a share code, a check must instead be made using the Home Office Employer Checking Service before the individual starts work.
- A dated copy or screenshot of the online check result (or of the passport/documents checked) will be retained within the staff member's electronic staff file or on the HR Information System, showing the date the check was carried out.
- Where an employee's permission to work in the UK has a time limit, a follow-up check will be carried out before that permission expires, in order to maintain the statutory compliance.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. Senior managers are responsible for compliance in their respective areas and departments and for their supplier relationships in relation to the monitoring and enforcement of our internal policies and values.

Purchasing of goods for member reward/recognition

Our supply chains include over 50 suppliers covering all aspects of building maintenance to technology. We encourage our suppliers to endorse such principles to demonstrate their opposition to human trafficking and modern slavery. We have communicated with our key suppliers, and have obtained their modern day slavery policies to ensure that their internal processes are meeting the high standards that we expect. Where a supplier fails to meet their own policy and our own high standards, we request a full response to the reasons for the failing, and if not suitable or future failings happen, terminating contract is the final option.

Due diligence processes for slavery and human trafficking

We have in place a policy to protect whistle blowers who highlight to us any risk of slavery or human trafficking within our business.

We understand that our responsibility to eradicate any form of modern slavery in our business and supply chains is an ongoing process. We will continue to review all aspects of this policy and publish an updated version on an annual basis. All employees are required to read our full policy document on an annual basis and answer questions relating tothe policies to ensure all employees understand their role.

SAFER RECRUITMENT POLICY

Introduction

Explore Learning is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment.

Safer recruitment means taking steps to ensure we only appoint individuals who are suitable for providing unsupervised tutoring, while keeping children and young people safe from maltreatment, neglect, violence and sexual exploitation.

This policy has been produced with consideration of the DfE guidance "Keeping Children Safe in Education (September 2026)" (KCSIE) where applicable to Explore Learning, guidance on Disqualification under the ChildcareAct 2006 (DUCA) (August 2018), the Prevent Duty Guidance for England and Wales 2021 (the Prevent DutyGuidance) and guidance published by the Disclosure and Barring Service (DBS).

Purpose

The purpose of this policy is to set out the minimum requirements of the recruitment process for employees of Explore Learning that aims to:

- attract the best possible applicants to vacancies;
- deter prospective applicants who are unsuitable for work with children and young people;
- identify and reject applicants who are unsuitable for work with children and young people.

1. Recruitment Training

1.1 All staff involved with recruiting and selecting staff are trained in child safeguarding and the requirements and behaviours required to ensure safe and fair recruitment.

1.2 Each member of the centralised recruitment team has successfully completed accredited training in safe recruitment procedures (CPD accreditation, run by the NSPCC).

2. Recruitment procedures

2.1 Recruitment adverts include a role description including the qualities and standards required in the successful candidate, and details of the checking procedures to be carried out. The advert will make clear the safeguarding responsibilities of the post as per the job description and person specification and whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

2.2 An application form and CV are required, and carefully scrutinised. Shortlisting includes checking for qualifications, experience and skills relevant to the job role. All applicants to the company are asked if they have ever been disqualified or pending disqualification from working with children. If a candidate selects yes, they are automatically rejected. Candidates that disclose that they have been employed by us before are cross-checked on our HR Information System. The application form includes a statement that it is an offence to apply for a role involving regulated activity if the applicant is barred from engaging in regulated activity. At the point of application, applicants are given a copy of our Safeguarding Policy, Safeguarding Procedures and the policy on the employment of ex-offenders.

2.3 Hiring decisions are carried out by a minimum of 2 trained staff members, at different stages of the recruitment process. An interviewer must declare if they know the applicant prior to interview.

2.4 Interviews include identity checks, strengths-based questions and safeguarding scenarios relevant to the role. Thecandidate will also be asked at interview what attracted them to the post being applied for and their

motivation for working with children, and they will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

2.5 Written notes are made during and after each interview to ensure fair evaluation and / or comparison of candidates against consistent criteria.

2.6 Where an individual application form has raised particular questions e.g. employment gaps or spent convictions, these must be satisfactorily explained and documented in the recruitment process.

2.7 Any disclosures or concerns relevant to safe recruitment are clearly identified and referred to the responsible director before recruitment decisions are made.

2.8 Application forms, work history, qualification data where relevant and copies of original identity documents are securely retained on file for each individual during their time working with the organisation and for a period of three years following their employment.

3. Verification

3.1 Any gaps in employment are investigated and verified where necessary.

3.2 Where an individual left previous employment, the circumstances of departure are established e.g. disciplinary procedures or compromise agreements. Any concerns are referred to a director for assessment.

3.3 Where required for the purposes of the role, qualifications are evidenced.

3.4 Require two dated references, and request details of their previous experience and suitability to work with children. Where available, one must be from their most recent employer.

3.5 Identity documentation checks are carried out for all new employees. Where birth certificates are available, the candidate's name will be checked against the name on their birth certificate.

3.6 The individual's right to work in the UK is verified and documentation securely retained.

3.7 A suitability self-declaration and a record of current and history of physical and mental health is completed by all new employees.

3.8 An Enhanced DBS/PVG/NI Access check, with Children's Barred From List check, is carried out on all contract, temporary and permanent staff. All staff are subject to the same check unless they are only working in non- Regulated Activities under supervision. DBS/PVG/NI Access certificates must be issued before staff begin employment unless they can be fully supervised during their shifts until this is returned.

3.9 Updated enhanced DBS/PVG/NI Access checks are carried out on long-term staff at a minimum frequency of 5 years. Staff cannot continue to work if their enhanced DBS/PVG/NI Access is over 5 years old and a new certificate has not been applied for and returned. All staff are automatically notified when they are due for a renewal.

3.10 All enhanced DBS/PVG/NI Access information is recorded on the central HR Information System 'SelectHR'.

3.11 Any Positive Disclosure information revealed is referred to the Head of Safeguarding and Head of People Operations and made subject to a thorough assessment as part of the onboarding process, or before a job offer is made if disclosedas part of the recruitment process.

3.12 Where an applicant has lived or worked abroad, such additional checks as are necessary will be carried out.

3.13 Where any doubts remain as to the safety of recruiting the individual, the principle of child safety first is followed.

4. Probation

Staff are subject to a probationary period of 4 months as a term of their contract.

5. Staff training

5.1 Once recruited, all new team members receive training and written policies and procedures to ensure they remain fully aware of our Safeguarding Policies & Procedures.

5.2 All staff receive training and have access to written guidelines on safer working practices, reporting procedures if they suspect that a child or young person is at risk of harm, and managing allegations against members of staff and whistle-blowing.

6. Working with third party service providers

6.1 Staff are responsible for ensuring that any individuals coming into contact with children and young people to provide activities or other services are subject to the same safeguarding requirements.

6.2 Written assurances of the above are gained from third party providers in advance of any service contract being agreed.

MANAGER RECRUITMENT POLICY

Explore Learning are committed to resourcing top talent across the UK to manage our physical centres and online communities while supporting ourfamilies. Our recruitment provision is managed centrally in-house by trained selectors ensuring a fair and thorough recruitment process. All candidates are assessed against the key strengths required to meet the role objectives.

Key Responsibilities

Our managerial roles are essential in helping us to deliver our company mission and goal of providing a service which not only impacts children academically, but also to develop a love for learning. The role mainly focuses on the following 4 key objectives:

- **Culture**: Embedding our values, setting the pace and being an inspirational role model
- **Processes**: lead on compliance and safeguarding, deliver consistently for our members
- **Leadership**: empower others to be successful, manage change and align the team
- **Strategy**: diagnose centre needs, plan strategically both long and short term, communicate with clarity
- **Growth**: drive acquisition and exception customer experience to drive commercial success

Centre Directors take overall responsibility of their centre's performance and the development of the managerial team.
Community Leads take overall responsibility of their community performance and the development of the managerial team for our online operation.

The annual salary starts from £27,000 for Centre Supervisors and Community Managers and £31,250 for Centre Managers and Community Leads. Both can receive additional weighting in specific locations. Both have length of service pay scales which are capped and consistent across the whole company.

Candidate Requirements

Our leaders are hired as either Centre supervisors or Centre Managers in centre and Community Managers or Community Leads. Leaders are that are hired to work in both our physical and online centres are assessed against the following competencies:

Supervisors/Co-ordinators:
Adaptability
Communication
Prioritisation
Self-Awareness
Motivating Others
Action-Oriented

Managers/Leads:
Problem Solving / Initiative
Adaptability
Communication
Planning & Prioritisation
Self-Awareness
Motivating Others
Creating Psychology Safety

Candidates must be:

- Confident in maths and English having achieved a grade C/5 or above in maths and English language GCSE or

equivalent

- Currently living in and has permission to work in the UK
- Job offers are made with the contractual agreement that we must receive proof of qualifications and identity including right to work in the UK, a suitable Enhanced DBS/PVG/NI Access certificate, two suitable references (where available, one must be from their most recent employer); as well as all other KCSIE 2026 safer recruitment requirements where applicable to Explore Learning (see our Safer Recruitment Policy).

Application Process

All applications are received and managed via an external applicant tracking system provided by ICIMS. Candidates agree to submitting their data and will be kept on file for us to access 3 years.

We assess all candidate's suitability through:

1. Automated job screening questions including right to work, disqualification from working with children, working hours and academic grades.
2. Online application screening including qualifications, skills and experiences identified on their CV, and freetext application form answers.
3. An online maths and English assessment – 10 questions, pass mark 70%.
4. An online video submission including one screening question
5. A telephone screening call with one of the selection and assessment team.
6. Strengths based virtual interview. Answers are recorded and candidates are scored out of 5 on the on the role objectives. Right to work is checked with suitable ID.
7. A centre visit prior to interview/job offer.
8. A self-declaration of their suitability, including their current and history of physical and mental health.
9. Ex-employees that reapply will have their employment records checked for suitability.
10. We will consider performance related feedback for internal applications. They also bypass the assessment and some job screening questions.

We aim to complete the entire recruitment process within 2-4 weeks. All candidates are notified of the outcome and can request specific feedback if desired. Successful candidates will be placed either directly into a centre or may commence training with their permanent location yet to be confirmed. This will be out of a small number of pre-agreed locations.

Unsuccessful candidates can be reconsidered after a 6-month period. We will consider a shorter period in extenuating circumstances.

If a position is filled before a candidate completes the application process, we will pause their application, informing them when a new position becomes available. We will honour any prearranged interviews and if the candidate is successful, we will place them in atalent pool until a place is available.

We advertise our managerial roles both internally and externally allowing for internal progression and experienced hire entry points.

The Explore Learning Development Programme is dedicated to the development of each and everyemployee. We are committed to training each individual in a wide variety ofchild welfare, educational and business skills. The Managerial Induction Training is provided via an extensive on-the-job programme of learning, as well virtual training courses to consolidate knowledge and skills further. Ongoing training is provided throughout a Manager's entire career with Explore Learning.

All staff complete a Training Needs Questionnaire within their Self Declaration Form when they start and have regular one-to-one conversations with their Line Manager to review their performance and continually assess their training needs. Staff are allowed time away from their daily duties to complete any training they may require.

Diversity and Inclusion in Recruitment

As part of the recruitment process, our applicants are all asked to complete an Equal Opportunities form – this is anonymous to recruiters and hiring managers. We capture information on gender identity, sexual orientation, ethnic identity, age, disability,and nationality. Candidates can opt out of each question by selecting 'prefer not to specify' or 'opt out'.

Through collecting our Equal Opportunities data, we will review our application and hire data on a quarterly basis. We will amend our attraction strategy accordingly and pro-actively source candidates from under- represented demographics. We will also review our selection practices to ensure a level playing field across all backgrounds and circumstances. We aim to have a:

- Similar comparison percentages throughout each stage of the selection process
- A fair split of applicants from across all diversity groups.
- Strong representation in alignment with national averages

Our recruitment selectors undertake regular unconscious bias training, double screening and scoring is analysed to ensure against discrimination.

All candidates are asked if they require any reasonable adjustments to support their application process or employment in the application form. We assess each situation individually and will accommodate wherever we can to give all applicants a fair chance of securing employment. This may include but is not limited to; time extensions on assessments or having interview questions in advance.

TUTOR RECRUITMENT POLICY

Explore Learning are committed to resourcing top talent across the UK to manage our physical centres and online communities while supporting ourfamilies. Our recruitment provision is managed centrally, in-house by trained selectors ensuring a fair and thorough recruitment process. All candidates are assessed against the key strengths required to meet the role objectives.

Key Responsibilities

Our part time tutors provide support to children both in centres and online helping them to progress academically, but also to develop their love for learning**.** The role mainly focuses on the following 4 key objectives:

- **Teach** maths, English, entrance exam preparation and GCSE maths to groups of up to 6 children aged between 4-16, tailoring your approach and supporting consistent progress.
- **Inspire** our members, building strong relationships and nurturing everyone you work with to become fearlesslearners.
- **Demonstrate progress** consistently and enable children to recognise progress towards their goals.
- **Support** families in maximising their membership through outstanding delivery of our service whilst prioritising the safeguarding of our members.

Successful candidates will start on an hourly rate between £8-£13.25 depending on age. Employees that work withing the M25 will receive an additional 50p per hour. Employees hourly rate will increase with responsibility and number of hours worked with a companywide pay scale.

Candidate requirements

We are looking for exceptional people, who fulfil our Tutor Skills: Adaptability, maths and English skills, communication, passion, relationship building, team player, growth mindset, customer obsessed, ownership, vibrant and motivational and role model.

Candidates must be:

- Confident in maths and English language having achieved a grade 6 or above in GCSE or equivalent.
- Online maths GCSE tutors must have a grade 8 or above in the mentioned qualification or equivalent.
- Committed to a permanent position and able to work a minimum of 6, consistent hours each week within our operating hours.
- Aged 16 or over in centre (17 or over online).
- Currently living in and has permission to work in the UK.
- Job offers are made with the contractual agreement that we must receive proof of qualifications, proof of identity, including right to work in the UK, a suitable Enhanced DBS/PVG/NI Access certificate, and two suitable references, ideally one from their most recent employer, and one that can testify to their suitability to work with children, in order to achieve clearance as suitable to work; as well as all other KCSIE 2026 safer recruitment requirements where applicable to Explore Learning (see our Safer Recruitment Policy).
- Online tutors must have their own laptop/PC with webcam and a stable internet connection with a minimum upload speed of 5mbps.

Application Process

All applications are received and managed online via an external applicant tracking system and candidates agree to submitting their data and will be kept on file for us to access 3 years. Candidates can request removal of their data at

any point.

If a candidate has applied to multiple locations, they will only be considered for one tutoring role at a time. If successful they will be offered the most suitable vacancy.

We assess an individual's suitability through:

1. Automated job screening questions including right to work, disqualification from working with children, working hours and academic grades.
1. An online maths and English assessment – 10 questions, pass mark 70%.
2. Recorded video interview assessing motivation, communication, and tutoring ability.
3. Strengths based virtual interview with a different assessor – answers are scored and recorded. Right to work is checked with suitable ID.
4. Job offers are accepted on a first come first serve basis. Should a candidate have a job offer extended but the role is no longer available, the candidate will be placed in our talent pool and be offered the next suitable position.
5. A self-declaration of their suitability, including their current and history of physical and mental health.
6. Ex-employees that reapply will have their records checked for suitability.

We aim to complete the entire recruitment process within 2-4 weeks. All candidates are notified of the outcome and can request specific feedback if desired. Successful candidates will be placed either directly into a team or intoour talent pool until a place is available for them.

Unsuccessful candidates can be reconsidered after a 6-month period. We will consider a shorter period in extenuating circumstances.

Training and support are provided, through regular formalised group training sessions as well as on an impromptu basis during working hours. For staff to be able to develop the necessary skills and knowledge to perform the duties listed above to the best of their ability, we place an extremely heavy emphasis on teamwork, expecting all the staff to support one another in the daily running of the centre or community.

Tutors can enhance their skills and responsibilities through additional training. This can include leading additional content classes, becoming a compere, on-call supervisor or enrolling on our Future Manager Programme.

POLICY FOR STAFF ELIGIBILITY TO WORK IN THE UK

Explore Learning is legally required to undertake certain documentation checks on every potential employee to avoid employing illegal workers. This policy applies to all new employees of the Company, irrespective of their national origin.

Before any individual of any nationality starts work for the Company, it is obligatory that they can prove entitlement to work in the UK.

DOCUMENT CHECKS

To ensure that all employees are eligible to work in the UK, Explore Learning will ensure that for all new staff, the following must be done

- For new employees who hold a valid UK or Irish passport, checks are processed via our government-accredited digital identity verification technology (IDVT) service, or by a manual document check of the original passport.
- For any new employee who does not hold a valid UK or Irish passport, their right to work must be verified using the Home Office's online right to work checking service, via a share code provided by the employee together with their date of birth. This online check is the only method that establishes a statutory excuse for this group - a physical document, including an expired Biometric Residence Permit (BRPs were withdrawn by the Home Office from October 2024), is not acceptable evidence on its own.
- Where an employee has an outstanding application, administrative review or appeal with the Home Office and cannot yet provide a share code, a check must instead be made using the Home Office Employer Checking Service before the individual starts work.
- A dated copy or screenshot of the online check result (or of the passport/documents checked) will be retained within the staff member's electronic staff file or on the HR Information System, showing the date the check was carried out.
- Where an employee's permission to work in the UK has a time limit, a follow-up check will be carried out before that permission expires, in order to maintain the statutory compliance.

POLICY ON THE RECRUITMENT OF EX-OFFENDERS

Explore Learning will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. We make appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar them from employment at Explore Learning. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for us to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for us to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful us to knowingly employ someone who works in the relevant settings and isdisqualified from providing childcare as set out in the statutory guidance “Disqualification under the Childcare Act 2006”.

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position with us. We will report the matter to the Police and/or the DBS if:

- we receive an application from a disqualified person;
- we are provided with false information in, or in support of an applicant's application; or
- we have serious concerns about an applicant's suitability to work with children

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through an enhanced DBS/PVG/NI Access check, we will considerthe following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and
- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is our normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is our normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

Data Protection Obligations

Explore Learning will comply with its data protection obligations in respect of the processing of criminal records information.

WHISTLE BLOWING POLICY

1. About this policy

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

This policy covers all employees, officers, consultants, contractors, casual workers and agency workers.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What is whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing, risks or dangers connected with our activities, whether they have happened, are happening or are likely to happen. This includes criminal activity such as bribery, fraud and the facilitation of tax evasion; any failure to comply with a legal or professional obligation; miscarriages of justice; risks to health and safety; damage to the environment; and safeguarding concerns relating to children or vulnerable adults. It also covers sexual harassment, which is now expressly recognised in law as a category of protected disclosure, and harassment related to any protected characteristic under the Equality Act 2010, including harassment by third parties such as parents, customers, contractors or visitors. Deliberately concealing any of these matters is also a reportable concern. Anyone who raises a genuine concern in good faith will be protected from detriment or dismissal for doing so.

Any concerns or allegations of abuse made against a member of Explore Learning staff should be addressed using the procedures set out in this document under the “Managing Allegations Against Members of Staff” policy.

For a concern to be protected under whistleblowing law, you must reasonably believe that your disclosure is in the public interest and that it tends to show one of the matters described above. Whistleblowing is concerned with risk or wrongdoing that affects others, the business, or the wider public. If your concern relates only to your own personal position at work - for example, a dispute about your own contract, pay or treatment - this is usually better addressed through our Grievance Procedure, and we will help direct you to the right process if you raise it here.

3. How to raise a concern

We hope that in many cases you will be able to raise any concerns with your manager, and all safeguarding concerns or concerns relating to allegations against members of staff should be raised in accordance with our Safeguarding Policy, Safeguarding Procedures and our Managing Allegations Against Members of Staff Policy. However, where for any reason you feel your concern needs to be raised under the Whistleblowing Policy, you should contact Explore Learning’s Head of People Operations. Contact details are at the end of this policy.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4. What happens next – investigation and keeping you informed

Once you have raised a concern, we will:

- acknowledge your concern and confirm who will be handling it;
- assess whether the matter requires a formal investigation and, if so, agree a reasonable timescale with you;
- keep you informed of progress at reasonable intervals, while respecting the confidentiality of anyone else involved; and
- provide you with feedback once the investigation concludes, including whether any action has been taken, to the extent we are able to share this without breaching the confidentiality or data protection rights of others.

We aim to complete most investigations within 20 working days. Where this is not possible, we will explain the reason for the delay and provide you with an updated timescale.

If you are not satisfied with how your concern has been handled, you should raise this with Explore Learning's Chief Operating & People Officer within 5 working days of receiving your outcome.

5. Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

6. Record keeping and data protection

We will keep a written record of concerns raised under this policy and of the steps taken to investigate and resolve them. These records help us respond consistently, demonstrate that concerns have been taken seriously, and allow us to defend the organisation's position if a concern is later considered by a court, tribunal or regulator.
Any personal data collected during a whistleblowing investigation will be processed in accordance with our Privacy Notice and UK data protection law. We will only share your identity or details of your concern with those who need to know in order to investigate or resolve it, and records will be kept securely and for no longer than is necessary.

7. External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external.

The NSPCC whistleblowing helpline is available for those who feel unable to raise any concerns internally about child protection failures internally. Contact details for the helpline are below.

8. Protection and support for whistle-blowers

We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform Explore Learning's Head of People Operations. If the matter is not remedied you should raise it formally using our Grievance Procedure.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

However, if we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower may be subject to disciplinary action.

Protect operates a confidential helpline. Their contact details are at the end of this policy.

9. Contacts

Explore Learning's People Operations Manager	**peopleops@explorelearning.co.uk**
Ofsted Complaints Line	**0300 123 4666**
NSPCC Whistleblowing Advice Line:	**0800 028 0285**
Protect (Independent whistleblowing charity)	**0203 117 2520** https://protect-advice.org.uk/

COMPLAINTS POLICY

Explore Learning Membership Complaints

Parents/guardians are informed that, should they feel at any time that they have reason for complaint or concern regarding the quality of service provision, in the first instance they should speak to a Manager. If they are still not satisfied, or if they would prefer not to discuss their concerns with a Manager, we recommend that they contact Explore Learning's Central Team on enquiries@explorelearning.co.uk, who will then be able to escalate it to the relevant member of staff. While we will make every reasonable effort to fairly and quickly resolve any complaint made, when further investigation is required we guarantee that written acknowledgement of the complaint will be provided within 7 working days and we aim to provide further feedback within 28 days of the initial complaint.

Complaints in Relation to Meeting Ofsted Requirements (England)

1. Any complaint made in writing or made by e-mail that relates to the Requirements of the Voluntary Childcare Register (in England) will be fully investigated.

2. Any complaint will be dealt with in full within 28 days of receipt of the written complaint, including a written response which will include an account of the findings of the investigation and any action taken as a result.

3. Explore Learning keeps a record of complaints (electronic editable form) which includes:

- the nature of the complaint,
- the Ofsted requirement it relates to,
- how the complaint was dealt with,
- the outcome of the investigation,
- any action taken, and
- whether the parent/guardian was given an account of the findings within 28 days of the date on which the complaint was received.

4. Complaint report summaries (data protected) are available to parents/guardians and Ofsted on request.

5. Complaints records are kept for three years, in line with Ofsted requirements. They are saved in the centre/community's Compliance One Drive Complaints Folder.

If the complainant is not happy with the final decision made or wishes to contact Explore Learning's regulatory body before speaking to the management team, they can take their complaint directly to Ofsted. Complaints made to Ofsted about a provider may be referred to the provider for investigation.

Ofsted Complaints Line: 0300 123 4666

CUSTOMER CONDUCT POLICY

Introduction

Explore Learning does not tolerate aggressive, abusive, discriminatory, threatening language or behaviour directed at our employees. We aim to create a warm, welcoming and inclusive environment for everyone at Explore Learning. As educators, one of the values we actively promote with our members is respect and we expect this from our customers. As outlined in our Equal Opportunities Policy, Explore Learning staff promote the British Values of R.I.D.E, which is a statutory obligation as part of our company Ofsted registration.

We consider any aggressive, abusive, discriminatory or threatening behaviour and/or language to be in direct conflict with our values.

This policy outlines how we recognise when a customer's behaviour becomes unacceptable and gives our employees guidance on how to act in these circumstances. The policy aims to protect our staff from harm in the workplace and makes sure we are consistent and fair to all customers/members when we respond to instances of abusive or discriminatory behaviour.

Key Principles

Explore Learning is proud of its diverse workforce and is committed to offering equal opportunities to all employees irrespective of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation. These are all protected characteristics, as described in the Equality Act 2010.

We won't tolerate discriminatory or derogatory language or behaviour directed towards our employees. This relates to any form of interaction, i.e. face to face, online, over the phone, or any other form of communication.

This includes:

- Any form of aggressive, abusive, discriminatory or threatening behaviour.
- Use of inappropriate language, verbal or written, which may cause a member of staff to feel scared, abused, intimidated, threatened or offended.

This could be:

- creating a hostile or offensive interaction
- using a bullying tone or language
- inappropriate religious, cultural or racial comments or insults; including racial stereotypes and judgements based on accent
- homophobic and transphobic comments
- sexist or other derogatory remarks
- discrimination against any other protected (or perceived) characteristics as defined by the Equality Act 2010, as outlined above.

The policy in action

When a customer or member engages in any of the above behaviour, or when the language becomes abusive and/or personal to an individual's identity or characteristics, the situation becomes unacceptable. This includes incidences relating to an employee's personal characteristics, as well as a customer's response to a specific membership query or disagreement. In either scenario, our staff will:

- In the first instance, politely and respectfully ask customers/members to stop using this kind of language or behaving in this way, in line with this customer conduct policy.
- If the behaviour then continues, our employees can stop the conversation or remove themselves from the situation.

- When an incident has taken place, we will fully investigate to understand what has occurred and appropriate actions to be taken.
- Behaviour that is deemed to be in breach of our values may lead to a request to terminate a customer's membership.

Who this applies to

This policy applies to all Explore Learning customers/members, any members of the public who engage with our staff and any external parties or contractors who come into contact with our employees.

- All customers are responsible for treating our staff with respect and courtesy. The same principle applies when interacting with other families and members.
- All colleagues are responsible for handling and reporting unacceptable customer behaviour to their line manager who has operational responsibility.

POLICY FOR WORKING IN PARTNERSHIP WITH SCHOOLS

When working with schools, staff are required to comply with all of our policies and procedures, except where the policy or procedure explicitly states that it is applicable only in Explore Learning's centres. This policy sets outsome of the specific requirements for our relationships with schools, but must be read in conjunction with our other policies. At all times when working with schools we will take into account the schools' policies and procedures, as well as our own.

Online Tuition

The majority of our school partnership tutoring takes place online. Where this is the case, our Online Safety Policy and Procedures will apply, in addition to the measures defined below.

Managing the relationship with schools

Our Community Manager (CM) provides a constant point of communication and support for teachers,ensuring quality two-way communication.

We encourage each school to identify a single point of contact for communication where possible. We thenfollow this four-step plan:

1. The CM meets with the school-appointed teacher to discuss overall aims and objectives, including contextual knowledge of the school's curriculum and pedagogy.

2. The CM, supported by our Central Team, collates relevant information about each child from the teacher, including SEND data and individual learner focuses, and a signed Schools Agreement. This information will be used to create a bespoke curriculumand establish goals for each child. Goals will address both attainment and attitudinal targets. Explore Learning rewards children on developing 'fearless learning habits', such as being resilient in the face of a challenge, asking for help and not being afraid to make mistakes. These are specific to each child and will be reviewed with teachers during the child's time with us.

3. All relevant information will be communicated with our tutors via our central management system Dora.

4. Session times are scheduled for an agreed period of time (usually a series of terms of a whole academic year) and a review meeting is offered to the school to discuss ongoing aims of the programme.

Safeguarding Responsibilities

We will require confirmation in writing on who will be available to manage safeguarding concerns raised when on Explore Learning premises. In particular:

- The name of the school's Designated Safeguarding Lead (DSL) and their contact information.
- The school's reporting and escalation process.

In the event of a report being made, an Explore Learning Incident form will still be completed and follow up withthe school DSL to ensure appropriate escalation.

If it is determined that Explore Learning is to handle safeguarding concerns, we require the children's homeaddress in order to pass on to police and Children's Social Care (if applicable).

DORA:

During tutoring sessions, children must be logged in and out on DORA. Online sessions are logged in and out

automatically.

Centre Tuition
There may be circumstances where we deliver tuition sessions in our centres, face to face. All of the above procedures apply, in addition to the measures outlined below:

Child Information:

Ofsted requires Explore Learning to hold the full name, date of birth and home address for every child. We also need the full name, contact number and home address for parents/guardians. This information will be kept securely and confidentially in accordance with our Privacy Policy.

Safeguarding:

These additional safeguarding considerations **must** be read alongside our Safeguarding Policy and Safeguarding Procedures, as well as the school's safeguarding policy.

Responsibility for the children:

The school will fill out an agreement detailing whose responsibility the children will be when on Explore Learning premises. This may be a school member of staff if:

- The staff member is permanently present; and
- Has a valid enhanced DBS/PVG/NI Access; and
- Is paediatric first aid trained.

If that member of school staff is absent for any reason, then another member of school staff may take on this responsibility, provided, they fulfil each of the above criteria.

Process in an emergency:

In the event that there is ever an emergency involving one of the students, we need to ensure Explore Learning orthe accompanying teacher has immediate access to parent/guardian contact information. It must therefore be established prior to the first tutoring sessions, who will hold this information.

In the event of an accident, Explore Learning will follow its usual procedures. The child's address is required fromthe school in order to complete the accident report, which will be kept securely in accordance with our Privacy Policy.

Medical Needs:

It will be agreed in writing with the school:

- Who will hold medication
- Who will administer medication
- How the arrangements for the medication, and any administration, will be recorded
- The procedure for, medication being signed in and out

Asthma sufferers should have asthma plans in place and a copy should be held at the centre.

If Explore learning will have responsibility for administering medicine in an emergency, medication treatment permission forms must be completed and signed by the parents.

PROVIDING STATEMENTS FOR EXTERNAL PROCEEDINGS POLICY

Explore Learning recognises that from time to time, staff may be approached by parents, carers, legal representatives or other parties requesting written or verbal statements for the purpose of external proceedings, such as family court, EHCPs, visa applications etc. Explore Learning takes such requests seriously and is committed to acting in a way that is compliant with our legal, safeguarding, and data protection responsibilities, while also protecting staff from being placed in difficult or inappropriate situations.

Staff at Explore Learning are not qualified to provide professional assessments or opinions relating to custody, welfare, SEN or family arrangements and should not do so under any circumstances. Explore Learning's role is limited to delivering educational sessions and therefore any involvement in legal proceedings will be strictly limited to the provision of factual information only, and only when deemed appropriate by the Safeguarding Team.

Explore Learning recognises the sensitive nature of such requests and the importance of maintaining professional boundaries, confidentiality, and neutrality at all times.

This policy applies to all Explore Learning employees.

Principles

Explore Learning will:

- **Protect staff** from being placed in adversarial or distressing situations related to family legal disputes.
- **Ensure neutrality**, professionalism and adherence to factual accuracy.
- **Maintain compliance** with safeguarding and data protection legislation at all times.
- **Respond appropriately** only where there is a clear legal basis or consent from a person with parental responsibility.

Procedures for Handling Requests

Initial Contact

- Any request for a statement—whether verbal or written—must be directed immediately to the **Centre Director** or **Community Manager**.
- Staff must not provide any comment, record or feedback to the requesting party until escalated according to procedures.

Internal Escalation

- The Centre Director/Community Manager must escalate the request to the **Safeguarding Team.**
- A decision will be made about whether it is appropriate to provide a response.

Assessment of Request

- The Safeguarding Team will assess:
- Whether the request is legally valid (e.g. accompanied by a court order, legal instruction or written consent).
- What information is being requested and whether it falls within our remit.
- Any safeguarding implications or potential risks to staff or children.

Responding

- If Explore Learning agrees to respond, a **factual statement** may be provided. This may include:
    - Dates and frequency of a child's attendance, progress meetings and parental attendance.
    - Objective, factual observations directly related to the child's engagement with Explore Learning.
    - Statements will never include opinions or speculations regarding family circumstances or parenting ability. The statement will be:

- Drafted by the **Centre Director** or **Community Manager**.
- Reviewed by the **Safeguarding Team.**
- Shared directly with the requesting legal authority, or person with Parental Responsibility who has made the request.
- Recorded in the Centre/Community Compliance folder on One drive.

Non-Participation in Legal Proceedings

Explore Learning staff are **not permitted** to:

- Write character references for family members in court cases.
- Provide opinion-based statements (e.g. on parenting, custody, welfare, or emotional wellbeing).
- Attend court unless required by **subpoena** or legal mandate.
- If a subpoena is issued, this must be notified to the **Safeguarding Team** immediately. Staff will be supported throughout the process.

Data Protection and Confidentiality

- All requests must be handled in line with the **Data Protection Policy** and the **Policy for the Storage, Handling & Management of Confidential Records**. Personal data will not be shared without:
- Written parental consent from **a person with parental responsibility**, or
- A valid **court order** compelling disclosure.

Safeguarding Considerations

If a request for a court statement discloses or implies risk of harm to a child, this will be treated as a safeguarding concern and acted upon in line with the **Explore Learning Safeguarding Policy**. Safeguarding always takes precedence over data confidentiality or procedural neutrality.

Roles and Responsibilities

- **All Staff**: Must refer any such requests to the Centre Director/Community Manager or Safeguarding Team and not respond independently before escalating.

- **Centre Directors/Community Managers**: Act as the first point of contact and ensure the request is appropriately escalated.

- **Safeguarding Team**: Assess, approve, and respond to requests for approval, provide guidance, and ensure legal and safeguarding compliance.

DATA PROTECTION POLICY

Part 1: Key Principles

Background

Data protection is an important legal compliance issue for Explore Learning. During the course of Explore Learning's activities it collects, stores and processes personal data (sometimes sensitive in nature) about staff, members, their parents, its contractors and other third parties (in a manner more fully detailed in our Privacy Policies). Explore Learning, as "data controller", is liable for the actions of its staff and in how they handle data. It is therefore an area where all staff have a part to play in ensuring we comply with and are mindful of our legal obligations, whether that personal data handling is sensitive or routine.

UK data protection law consists primarily of the UK version of the General Data Protection Regulation (the GDPR) and the Data Protection Act 2018 (DPA 2018). The DPA 2018 includes specific provisions of relevance to us: in particular, in the context of our safeguarding obligations, and regarding the right of access to personal data.

Data protection law has in recent years strengthened the rights of individuals and placed tougher compliance obligations on organisations that handle personal information. The Information Commissioner's Office (ICO) is responsible for enforcing data protection law, and will typically look into individuals' complaints routinely and without cost, and has various powers to take action for breaches of the law.

Definitions

Key data protection terms used in this data protection policy are:

Data controller – a person or body that determines the purpose and means of the processing of personal data, andwho is legally responsible for how it is used. For example, Explore Learning is a controller.

Data processor – an organisation that processes personal data on behalf of a data controller, for example a payroll or IT provider or other supplier of services with whom personal data may be shared but who is not authorised to make any decisions about how it is used.

Personal data breach – a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Personal information (or 'personal data') - any information relating to a living individual (a data subject) by which that individual may be identified by the controller. That is not simply a name but any form of identifier, digital or contextual, including unique ID numbers, initials, job titles or nicknames. Note that personal information will be created almost constantly in the ordinary course of work duties (such as in emails, session plans and minutes of meetings). The definition includes expressions of opinion about the individual or any indication of Explore Learning'sor any person's, intentions towards that individual.

Processing – virtually anything done with personal information, including obtaining or collecting it, structuring it, analysing it, storing it, sharing it internally or with third parties (including making it available to be viewed electronically or otherwise), altering it or deleting it.

Special categories of personal data – data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health and medical conditions, sex life or sexual orientation, geneticor biometric data used to identify an individual. There are also separate rules for the processing of personal data relating to criminal convictions and offences.

Application of this policy

This policy sets out Explore Learning's expectations and procedures with respect to processing any personal data we collect from data subjects (including parents, students, employees, contractors and third parties).

Those who handle personal data as employees are obliged to comply with this policy when doing so. For employees, breaches of this policy may result in disciplinary action. Accidental breaches of the law or this policy in handling personal data will happen from time to time, for example by human error, and will not always be treated as a disciplinary issue. However, failure to report breaches that pose significant risks to Explore Learning or individuals will be considered a serious matter.

Where we share personal data with third party data controllers – which may range from schools, to parents, to appropriate authorities – each party will need a lawful basis to process that personal data, and will be expected to do so lawfully and with due regard to security and confidentiality, as set out in this policy.

Person responsible for Data Protection

We have appointed Richard Reynolds, Daniel Hyatt, Keith Sterling and Caroline Oakley as the Data Privacy Managers who will endeavour to ensure that all personal datais processed in compliance with this Policy and the principles of applicable data protection legislation. Any questionsabout the operation of this policy or any concerns that the policy has not been followed should be referred in the first instance to the data privacy manager via DPM@explorelearning.co.uk

The Principles

The GDPR sets out six principles relating to the processing of personal data which must be adhered to by data controllers (and data processors). These require that personal data must be:

1. Processed lawfully, fairly and in a transparent manner;
2. Collected for specific and explicit purposes and only for the purposes it was collected for;
3. Relevant and limited to what is necessary for the purposes it is processed;
4. Accurate and kept up to date;
5. Kept for no longer than is necessary for the purposes for which it is processed; and
6. Processed in a manner that ensures appropriate security of the personal data.

The GDPR's broader 'accountability' principle also requires that we not only processes personal data in a fair and legal manner but that we are also able to demonstrate that our processing is lawful. This involves, among other things:

- keeping records of our data processing activities, including by way of logs and policies;
- documenting significant decisions and assessments about how we use personal data (including via formal risk assessment documents called Data Protection Impact Assessments); and
- generally having an 'audit trail' vis-à-vis data protection and privacy matters, including for example when and how our Privacy Policies were updated; when staff training was undertaken; how and when any data protection consents were collected from individuals; how personal data breaches were dealt with, whether or not reported (and to whom), etc.

Lawful grounds for data processing

Under the GDPR there are several different lawful grounds for processing personal data. One of these is consent. However, given the relatively high bar of what constitutes consent under GDPR (and the fact that it can be withdrawnby the data subject) it is considered preferable for us to rely on another lawful ground where possible.

One of these alternative grounds is 'legitimate interests', which is the most flexible basis for processing. However, itdoes require transparency and a balancing assessment between the rights of the individual and the interests of Explore Learning. It can be challenged by data subjects and also means Explore Learning is taking on extra responsibility for considering and protecting people's rights and interests. Explore Learning's legitimate interests are

set out in its Privacy Notice, as GDPR requires.Other lawful grounds include:

- compliance with a legal obligation, including in connection with employment, engagement of services and diversity;
- contractual necessity, e.g. to perform a contract with staff or parents, or the engagement of contractors;
- a narrower set of grounds for processing special categories of personal data (such as health information), which includes explicit consent, emergencies, and specific public interest grounds.

Headline responsibilities of all staff

Record-keeping

It is important that personal data held by Explore Learning is accurate, fair and adequate. Staff are required to inform their manager if they believe that any personal data is inaccurate or untrue or if you are dissatisfied with how it is recorded. This applies to how staff record their own data, and the personal data of others – in particular colleagues,students and their parents – in a way that is professional and appropriate.

Staff should be aware of the rights set out below, whereby any individuals about whom they record information (notably in emails and notes) digitally or in hard copy files may have the right to see that information. This absolutely must not discourage staff from recording necessary and sometimes difficult records of incidents or conversations involving colleagues or students, in accordance with Explore Learning's other policies, and grounds may sometimes exist to withhold these from such requests. However, the starting position for staff is to record every document or email in a form they would be prepared to stand by should the person about whom it was recorded ask to see it.

Data handling

All staff have a responsibility to handle the personal data which they come into contact with fairly, lawfully, responsibly and securely and in accordance with all relevant policies and procedures (to the extent applicable to them). In particular, there are data protection implications across a number of areas of our wider responsibilities such as safeguarding and IT security, so all staff should read and comply with the following policies:

- Safeguarding Policy and Safeguarding Procedures
- Online Learning - Safety Policy and Procedures
- Managing Allegations Against Members of Staff
- Storage, Handling and Administration of Medication/Treatment Policy
- Safe Storage and Management of Confidential Documents and Records Policy
- Centre Security Measures and ICT Security Policy and Procedures
- Personal Data Breach Procedures

Responsible processing also extends to the creation and generation of new personal data / records, as above, which should always be done fairly, lawfully, responsibly and securely.

Avoiding, mitigating and reporting data breaches

One of the key obligations contained in the GDPR is on reporting personal data breaches – see Part 3 of this Data Protection Policy.

Care and data security

More generally, we require all staff (and expect all our contractors) to remain mindful of the data protection principles (see above), and to use their best efforts to comply with those principles whenever they process personal information. Data security is not simply an online or digital issue but one that effects daily processes: filing and sending correspondence, notably hard copy documents. Data handlers should always consider what their most assured and secure means of delivery is, and what the consequences would be of loss or unauthorised access.

We expect all those with management / leadership responsibilities to be particular champions of these principles and to oversee the swift reporting of any concerns about how personal information is used by Explore Learning to the Data Privacy Manager, and to identity the need for (and implement) regular staff training. Staff must attend any training we require them to.

Rights of Individuals

In addition to Explore Learning's responsibilities when processing personal data, individuals have certain specific rights, perhaps most significantly that of access to their personal data held by a data controller (i.e. Explore Learning).This is known as the 'subject access right' (or the right to make 'subject access requests'). Such a request must be dealt with promptly and does not need any formality, nor to refer to the correct legislation. If you become aware ofa subject access request (or indeed any communication from an individual about their personal data), you must tellthe Data Privacy Manager as soon as possible.

Individuals also have legal rights to:

- require us to correct the personal data we hold about them if it is inaccurate;
- request that we erase their personal data (in certain circumstances);
- request that we restrict our data processing activities (in certain circumstances);
- receive from us the personal data we hold about them for the purpose of transmitting it in a commonly used format to another data controller; and
- object, on grounds relating to their particular situation, to any of our particular processing activities where the individual feels this has a disproportionate impact on them.

None of the above rights for individuals are unqualified and exceptions may well apply. However, certain rights are absolute and must be respected, specifically the right to:

- object to automated individual decision-making, including profiling (i.e. where a significant decision is made about the individual without human intervention);
- object to direct marketing; and
- withdraw one's consent where we are relying on it for processing their personal data (without affecting the lawfulness of processing carried out prior to that point in reliance on consent, or of any processing carried out on some other legal basis other than consent).

In any event, however, if you receive a request from an individual who is purporting to exercise one or more of theirdata protection rights, you must tell the Data Privacy Manager as soon as possible.

Data Security: online and digital

Explore learning must ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. In order to stay compliant with this requirement, staff must ensure they follow the Centre Security Measures and ICT Security Policyand Procedures.

Data protection law is therefore best seen not as oppressive red tape, or a reason not to do something necessary or important, but a code of useful and sensible checks and balances to improve how we handle and record personal information and manage our relationships with people. This is an important part of Explore Learning's culture and all its staff and representatives need to be mindful of it.

Part 2: POLICY FOR THE SAFE STORAGE AND MANAGEMENT OF CONFIDENTIAL DOCUMENTS AND RECORDS

Explore Learning Ltd complies with the General Data Protection Regulation 2018 and Data Protection Act 2018 and is committed to the safe storage of records. This information will be kept on the centre premises within the secure environment of the staff office and/or within our secure database systems.

Explore Learning will keep records of the following and retain them for a minimum period of two years and a maximum period of three years:

- The name, home address and date of birth of each child who is registered with Explore Learning
- The name, home address, phone number and email address of parents/guardians of each child who is registered with Explore Learning
- Bank details
- Emergency contact information and collection arrangements
- Medical conditions and SEN details
- Staff and Visitor Log

Explore Learning will keep the following records and retain them for a period of three years:

- A daily record of children's name undertaking sessions online and in physical centres and their booking times
- Complaint records

Explore Learning will keep the following records and retain them for a period of six years:

- Staff files

Explore Learning will keep records of the following and retain them indefinitely:

- Accidents which involve the children being cared for occurring on the premises where childcare is provided.
- Incidents which involve the children being cared for occurring on the premises, or during online sessions, to include disclosures and allegations made by children or concerns about a child's welfare or safety.
- Any medicine administered to any child who is cared for on the premises, including the date and circumstances and who administered it, including medicine which the child is permitted to self-administer, together with a record of a parent/guardian's consent.

Children's Records:

- All children's records comply with the Children Act 1989
- An electronic record will be kept on the membership database.
- Are openly shared with the child's parent/guardian and their contribution is valued.

After 3 years, member records will be archived and anonymised on our electronic membership system.

In the event of a centre closing, all records are sent to a secure storage unit within the Explore Learning estate and kept for the appropriate period of time as described above.

In the event of Explore Learning Ltd as a company ceasing to operate, all records and documentation will become the responsibility of the CEO. They will maintain the secure storage of the above records and documentation for the appropriate length of time. All electronic data will be stored in accordance with the GDPR.

While Explore Learning staff share records and information concerning a child and their family, this information is private and therefore treated with strict confidentiality. On joining Explore Learning Ltd all employees sign a contract of employment and agree to keep all information about a child and their family, other employees and the Company strictly confidential.

Ofsted have the right to inspect our records at any point.

Part 3: EXPLORE LEARNING LTD PERSONAL DATA BREACH PROCEDURES

This procedure applies in the event of a personal data breach under Article 33 *Notification of a personal data breach to the supervisory authority,* and Article 34 *Communication of a personal data breach to the data subject* of the General Data Protection Regulation (GDPR).

Procedure – Breach Notification Data Processor to Data Controller

All of Explore Learning's Centre or Community Managers will report any personal data breach to the Data Privacy Manager withoutundue delay and the Data Privacy Manager will record it on the Internal Breach Register.

Where a breach is suspected, the priority is to report it immediately. Staff should report by telephoning the IT Helpdesk on 01483 447415 or contacting their Centre/Community Manager in person, and follow up by email to DPM@explorelearning.co.uk. A ticket can also be raised via Fresh Service at http://explorex.freshservice.com/. The IT department is involved in the detection, triage and technical containment of breaches, working alongside the Data Privacy Manager. For the full incident response process, including escalation, containment, recovery and external communications, refer to the Explore Learning Cyber Security Response Plan.

Procedure – Breach Notification Data Controller to Supervisory Authority

Explore Learning will notify the supervisory authority of a personal data breach (ICO: Information Commissioner's Office) without undue delay. Explore Learning will assess whether the personal data breach is likely to result in a risk to the rights and freedoms of the data subjects affected by the personal data breach. If a risk to the aforementioned is likely, Explore Learning will report any personal data breach to the ICO without undue delay, and where feasible within 72 hours. Where data breach notification to the supervisory authority is not made within 72 hours, it shall be accompanied by the reasons for the delay.

The data controller shall provide the following information to the supervisory authority:

- A description of the nature of the breach
- The categories of personal data affected
- Approximate number of data subjects affected
- Approximate number of personal data records affected
- Likely consequences of the breach
- Any measures that have been or will be taken to address the breach, including mitigation
- The information relating to the data breach, which may be provided in phases

Procedure – Breach Notification Data Controller to Data Subject

Where the personal data breach is likely to result in high risk to the rights and freedoms of the data subject, Explore Learning will notify the affected data subjects without undue delay.

- The notification to the data subject shall describe in clear and plain language the nature of the breach including the information specified above.
- Appropriate measures have been taken to render the personal data unusable to any person who is not authorised to access it, such as encryption.
- The controller has taken subsequent measure to ensure that the rights and freedoms of the data subjects are no longer likely to materialise.
- It would require a disproportionate amount of effort. In such a scenario there shall be a public communication or similar measure whereby the data subject is informed in an equally effective manner.

CENTRE SECURITY MEASURES AND ICT SECURITY POLICY AND PROCEDURES

This document identifies the key elements of Explore Learning's security management systems and the ways in which we seek to improve security for our members, families, staff and visitors who may be affected by centre activities. This document also sets out Explore Learning's Information Security Policies governing protection of the confidentiality, integrity and availability of the computer network and its resources.

It establishes the responsibilities for IT security, preserve integrity of the computer network, protect the computer network and its resources, preserve confidentiality and protect assets against unauthorised disclosure.

Explore Learning staff and members are a key resource and it is essential that risks to their security are properly controlled through an effective security management system and commitment at all levels, and ensures confidentiality.

Explore Learning Security Procedures

Responsibilities

The Senior Management Team

- The Senior Management Team will ensure a security measures policy is in place and is monitored andreviewed annually.
- The Senior Management Team will ensure that Explore Learning staff are aware of and adhere to thesecurity measures policy and participate in training where appropriate.

The Centre Staff

Will have delegated responsibility for the day to day security of the Explore Learning centre and for ensuring such things as:

- All staff appreciating the importance of security and understand the security measures policy/procedures and their own responsibilities.
- New staff are informed of the security measures policy/procedure.
- Parents/guardians and attending members are informed of the security measures policy/procedure and encouraged to help ensure that Explore Learning has a safe centre culture.
- Advice will be sought from the police where necessary.
- All crimes will be reported to the police.
- Carry out regular routine security checks within visual risk assessments of the centre, report any maintenance issues of centre security systems and equipment, and raise awareness of security issues.
- All staff considering the sensitivity of the information they handle.
- All staff protecting information in proportion to its sensitivity by ensuring that information, whatever its format, is secured by physical means or by using approved electronic means (laptop/table-pc).
- Ensuring that centre teams participate in phishing simulation and refresher training activities as part of ongoing awareness.

Centre Security Measures

Site Security

Centre managers are responsible for the security of buildings and property.

- Rear external doors should never be propped open.
- If a member of staff loses their keys or security alarm fobs, they should inform the Facilities Manager immediately.
- Centre staff in stand-alone centres, need to report any maintenance issues with the ADT alarm, by either contacting the Facilities Manager or ADT on 0344 800 1999.
- Centre staff in stand-alone settings know how and when use and reset their panic alarms, which are linked to the Police.
- Centre staff in Sainsburys/Tesco/shopping centre based settings are familiar with their store security team, and how to contact them in the event of a concern or emergency.
- Centres with rear emergency access have alarms installed to monitor incorrect use of this exit. Alarm panel keys must never be kept in the system, and the alarm must be active at all times.
- At the end of the Explore Learning day each member of staff should ensure that all windows and externaldoors are securely fastened prior to a check by site staff.
- At the end of the Explore Learning day each member of staff should ensure that the centre office door is securely fastened as an additional security measure where possible. Where unrequired, external cleaners should not be permitted access to the office.
- In certain locations there may be CCTV installed, focussing on the public facing areas of the centre such as entrances and rear fire doors. If this is the case the DBS checked IT team control access to the system to recover recorded data. Recordings operate on a 24/7 basis and are automatically overwritten. Recoded data will be retained dependant on the disc size on site, this is between 7-28 days, depending on the unit installed.

Contractors

- Contractors on centre site (including cleaning staff) are required to observe the centres security measures policy/procedure.
- Building materials and cleaning equipment must be locked away or kept out of reach of children at all times.
- Centre managers must agree centre access with contractors and cleaning staff, and provide keys, alarmfobs and suitable training on centre security measures where appropriate.

Personal Property

Members are discouraged from bringing valuable items into the centre and in the event that they do so Explore Learning accepts no liability. Staff are responsible for their own personal property.

Money on Site

- Membership at Explore Learning is paid by Direct Debit, Tax Free Childcare or Childcare Voucher monthly payments, meaning that limited cash is stored on site.
- On the occasion that cash payments are taken on site for outstanding membership fees, money is secureduntil it is banked. Money should be preferably banked within 24 hours of collection.

ICT Security Procedures

Reporting IT and security concerns

All IT or security concerns – including suspected phishing, lost or stolen devices, unusual account activity, suspected malware, or any other security incident – should be reported promptly to the IT Helpdesk. Staff can contact the IT Helpdesk by telephone on 01483 447415, or by raising a ticket through Fresh Service at http://explorex.freshservice.com/. IT operates a structured incident management process; for the full process and escalation routes, see the Explore Learning IT Security Policy and Cyber Security Response Plan.

Network Security

Only Explore Learning employees, using company laptops/tablets and PC's can connect to the company network. This policy is also the same for all centres in the UK, where the same policy applies. These laptops/tablets and PC's are firstly set-up and managed by the I.T team prior to deployment and use by the Central Team and centre staff.

Computer Security & Monitoring

All staff must abide by the rules of the General Data Protection Regulation and the Computer Misuse Act 1990.

All resources of the company, including computers, email, and voicemail are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of the company then, at any time and without prior notice, the company maintains the right to examine any systems and inspect and review all data recorded in those systems. This will be undertaken by authorised staff only. Any information stored on a computer, whether the information is contained on a hard drive, USB pen or in any other manner may be subject to scrutiny by the company.

This examination helps ensure compliance with internal policies and the law. It supports the performance of internal investigations and assists in the management of information systems.

All corporate data on endpoints, drives, or removable media is subject to audit and may be reviewed by authorised personnel without notice, as per the IT Security Policy.

Web Security including Intranet

All UK wide centres are part of the Zen Internet UK wide MPLS (Multiprotocol LabelSwitching) network. This enables the company to manage all internet traffic via one breakout point, currently Zen datacentre in Manchester, with failover in Slough Berks, supported via two active firewalls providing content, malware and security-based policy protection.

The Bubble is hosted on SharePoint in conjunction with Microsoft's Azure Platform, also fully secure and redundant.

The internal curriculum and membership systems are fully hosted within the Microsoft Azure platform, and form part of its Platform as a service (PaaS). This is fully secured, and access is controlled centrally and managed through Active Directory.

Wireless Security

All employees who log into the Explore network via access points or more commonly known as WIFI, will be presented with a password prompt. The network is secure and uses industry standard encryption to manage the passwords. Limited access is available to guests. MAC addresses (media access control) are unique to each machine or mobile device that connects to the network, are also retained for security and monitoring movements around the network.

Email use, Teams and Security

Emails sent or received on the hosted email system, Office 365 (Microsoft), form part of the official records of the company. Explore Learning does not recognise any right of employees to impose restrictions on disclosure of emails within the system.

When using emails, employees must: ensure they do not disrupt the wider IT systems or cause an increase for significant resource demand in storage, capacity, speed or system performance e.g. by sending large attachment to a large number of internal recipients (currently set to 25MB), and bring it into disrepute, incur liability on the part of the company or adversely impact on its image.

Employees must not seek to gain access to restricted areas of the network or other "hacking activities" is strictly forbidden.

Employees must not use email for the creation, retention or distribution of disruptive or offensive messages, images, materials or software that include offensive or abusive comments about ethnicity or nationality, gender, disabilities,age, sexual orientation, appearance, religious beliefs and practices, political beliefs or social background. Employeeswho receive emails with this content from other employees, should report the matter to their line manager or supervisor.

Employees must not send email messages that might reasonably be considered by recipients to be bullying, harassing, abusive, malicious, discriminatory, defamatory, and libelous or contain illegal or offensive material, or foul language.

Employees must not upload, download, use, retain, distribute, or disseminate any images, text, materials, or software which might reasonably be considered indecent, obscene, pornographic, or illegal. In particular, due to the nature of Explore Learning's business and working with children, employees must understand that it is an offence to possess, distribute, show and make indecent images of children. You should not forward the images to anyone, even the Police, it is a very serious matter. If you come across indecent images of children online, you can report them to the Internet Watch Foundation (IWF). The Internet Watch Foundation (IWF) is the UK Internet Hotline for anyone to report online child sexual abuse imagery.

Employees should use their corporate email accounts for correspondence within their role at Explore Learning. They should not try to create forwarding rules to external addresses, if any changes are required to their account they should raise this with the IT Department via a formal support ticket.

Employees must not engage in activities that serve to deny service to other users outside of the scope of normal work-related duties – for example, unauthorised selling/advertising of goods and services, that would affect or have thepotential to affect the performance by damaging or overloading the company system, network, and/or external communications. They must also not engage in any activity that would result in any breach of software licencing outside of the intended use for their work related activities.

Staff who receive improper email from individuals inside or outside the Company, should discuss the matter in the first instance with their line manager or supervisor.

As part of the email security filters, we also utilise Barracuda network security, which scans incoming and outbound emails for viruses, Trojans, and network threats and vulnerabilities.

Passwords

- Passwords should not be written down or given to others to use under **any** circumstances, and for individual useonly.
- Passwords must be a minimum of 12 case sensitive characters and should be a combination of upper/lower/numeric/special characters. Ideally Passwords should also contain random characters such as #@?!$& etc.
- Passwords are automatically required to be changed every 90 days and cannot be a historic password.

If your manager needs access to your computer, for example if you are off sick, they must contact the IT team to request managerial access to your computer.

Password complexity, length and rotation requirements (minimum 12 characters, containing upper case, lower case, number and special characters; rotated every 90 days; no historic password reuse) are enforced centrally. Multi-factor authentication (MFA) is enforced through Microsoft Entra Conditional Access for all access to company systems.

Viruses

Bitdefender Endpoint Security anti-virus protection and Faronics Deep Freeze suite is installed on all laptop/PC/servers throughout the entire Explore networked environment. As part of Windows 10/11, windows defender is automatically configured, providing real-time threat protection/spyware/viruses/rootkits and other malicious software, updated across Microsoft's Azure cloud data centres.

Telephone & Mobile

All Explore Learning smartphones setup with work email accounts and/or internet-based access to company data must be protected with six-digit security passcode. Mobile phones may not be used to store and/or transmit personal data for which are company sensitive.

No company data may be stored on personal mobile devices unless secured via MDM with remote wipe capabilities.

Telephones are provided primarily for business use to assist staff in carrying out official company business. Company landlines and mobile phones must not be used for any secondary business purpose.

Return of Explore Learning Equipment

At the point an employee leaves the company, it is the responsibility of both the employee and their line manager to arrange for return of corporate technology equipment to the IT team by ensuring this is sent to Explore Learning's Staines centre for the attention of the IT Team. Communication regarding return of property should be sent before the employee leaves, and property returned within a week of their last day. All items must be returned within 7 days of leaving the company. Failure may result in withheld salary.

PRIVACY POLICY FOR MEMBERS AND PARENTS

Introduction to our Privacy Policy

Explore Learning is a company registered in England and Wales (registration number 4117281) under the name ExploreLearning Ltd; the address of our registered office is **Explore Learning, Unit F7B, Whiteley Shopping centre, Whiteley Way, Whiteley, Fareham, PO15 7PD**. We are registered as a data controller with the Information Commissioner's Office (registration number Z3440439).

Policy Aims

Explore Learning is committed to being transparent about how it collects and uses the personal data of its members and parents and to meeting its data protection obligations. This policy sets out the organisation's commitment to data protection, and individual rights and obligations in relation to personal data.

Explore Learning is committed to complying with data protection legislation and good practice including:

- Processing personal information only where this is strictly necessary for legitimate organisational purposes
- Collecting only the minimum personal information required for these purposes and not processing excessive personal information
- Providing clear information to individuals about how their personal information will be used and by whom
- Only processing relevant and adequate personal information
- Processing personal information fairly and lawfully
- Maintaining an inventory of the categories of personal information processed by Explore Learning
- Keeping personal information accurate and, where necessary, up to date
- Retaining personal information only for as long as is necessary for legal or regulatory reasons or, for legitimate organisational purposes
- Respecting individuals' rights in relation to their personal information, including their right of subject access
- Keeping all personal information secure

Responsibilities under the General Data Protection Regulation (GDPR)

- Explore Learning is a Data Controller and a Data Processor under the GDPR.
- Senior Management and all those in managerial or supervisory roles throughout Explore Learning are responsible for developing and encouraging good information handling practices within the organisation.
- We have appointed a Data Privacy Manager to oversee the management of personal information within Explore Learning and for ensuring that compliance with data protection legislation and good practice can be demonstrated. If you have any questions about this privacy notice or how we handle your personal information please contact the data privacy manager.
- Compliance with data protection legislation is the responsibility of all staff at Explore Learning who process personal information.

The Kind of information we hold about you:

As a tuition provider, Explore Learning is responsible for the personal information it handles in order to deliver our

service. This information is only used for delivering tuition and for safeguarding purposes:

The kind of information we hold varies, depending upon whether you are a customer of an Explore Learning centre and/or Explore at Home, or whether you/your child is receiving tuition with us via their school. More detailed information on this is as follows:

Customers of "Explore Learning" centres and "Explore at Home" online tuition.
When you express interest in Explore Learning and book a free trial session, we will collect and process the following data from you:

- your name
- email address which will be used to send you a confirmation email
- contact telephone numbers which will be used to send you a confirmation SMS and confirmation call
- child's name, age, school and reason for interest in tuition

When you join Explore Learning, we will collect and process the following data from you:

- Parent/Guardian's name, postal and email address, contact phone numbers
- Membership payer's name, postal and email address, contact phone numbers (if not parent/ guardian)
- Emergency contact's names and phone numbers
- Child/ren's name, age, date of birth and school
- Information about any medical conditions, allergies or Special Educational Needs of child/ren
- Details of Direct Debit and debit/credit cards in order for us to accept payment

You should notify Explore Learning of any changes in circumstances to enable personal records to be updated accordingly.

How we will use information about you

We need the above categories of information primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases we may use your personal information to pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below.

- For the purpose of delivering tuition and for improving that tuition service;
- To safeguard members' health and welfare and provide appropriate pastoral care;
- For the purposes of management planning and forecasting, research and statistical analysis
- To carry out or cooperate with any external complaints, disciplinary or investigation process
- Where otherwise reasonably necessary for Explore Learning's purposes, including to obtain appropriate professional advice and insurance.
- To enable relevant authorities to monitor our performance and to intervene or assist with incidents as appropriate.
- To escalate and investigate safeguarding concerns.

In addition, we will on occasion need to process special category personal data in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to takeappropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services;
- To provide educational services in the context of any special educational needs of a member;

Please note that we may use anonymised data which cannot be linked to you for research purposes and to improveour services, but will not be able to link that information to anyone who participates in the delivery of our tuition.

The data of customers of Explore Learning Centres and Explore At Home will additionally be used for the following purposes, subject to consent:

- You have the option of allowing us to use your child's photo for the purpose of promoting Explore Learningduring and/or after your membership.
- You have the option of allowing us to share your data with trusted external companies for research, analysisand personalised marketing. When we share your email address with trusted third-parties for marketing purposes, your data is anonymised, and will only be matched with existing data they hold. You can find out more in our Cookie Policy. If you do not wish to share your email address with third-parties as described above, so that we can show you personalised online adverts, please email: cookieunsubscribe@explorelearning.co.uk

Who will your personal information be shared with?

For the most part, personal data collected by us will remain us, and will be processed by appropriate individualsonly in accordance with access protocols (i.e. on a 'need to know' basis).

Occasionally, we will need to share personal information relating to students and parents with third parties, suchas:

- Professional advisers (e.g. lawyers, insurers, PR advisers and accountants).
- Government authorities (e.g., DfE, CAFCASS, police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies.
- Your data is hosted on several different systems. All these providers have relevant safeguards inplace to protect your data in the same way that we do.
- On signing up to an 11+ course as part of your membership, you agree to us sharing your name andhome address with a 3rd party organisation, our printing company, in order for your child's course resources to be sent directly to you via Royal Mail, or courier delivery service.
- Your data may be shared with our service providers (for example, suppliers who develop or host ourservices) in which case we will require them to implement appropriate technical and organisational measures to meet the requirements of applicable law.
- In connection with a sale, joint venture or other transfer of some or all of our company or assets,subject to the commitment of the acquiring entity to comply with this Privacy Notice

Access to sensitive data

Particularly strict rules of access apply in the context of "special category" data, most notably:

- medical records; and

- pastoral or safeguarding files.

Medical data: We need to process such information to comply with statutory duties and to keep members and others safe, but Explore Learning will ensure only authorised staff can access information on a need-to-know basis. Express consent will be sought where appropriate.

However, a certain amount of any SEND member's relevant information will need to be provided to staff more widely inthe context of providing the necessary care and education that the member requires.

How long we keep personal data

We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

- Upon cancellation of membership, your data will be stored safely and securely. We will retain your personal data for a minimum of 2 years and a maximum of 3 years following cancellation of your membership to comply with relevant safeguarding bodies regulations.
- Accident/Incident reports and Administration of Medication records will be kept indefinitely.
- Registers of attendance will be kept indefinitely.
- If you have any specific queries about how our retention policy is applied, or wish to request that personal datathat you no longer believe to be relevant is considered for erasure, please contact the data privacy manager. However, please bear in mind that we will often have lawful and necessary reasons to hold on to some personal data even following such request.
- A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

Data protection principles

All processing of personal data is done in accordance with the following data protection principles of the Regulation, and Explore Learning's policies and procedures are designed to ensure compliance with them. These are:

1. Personal data must be processed lawfully, fairly and transparently

The GDPR introduces the requirement for transparency whereby the controller has transparent and easily accessible policies relating to the processing of personal data and the exercise of individuals' "rights and freedoms". Information must be communicated to the data subject in an intelligible form using clear and plain language.

The specific information that must be provided to the data subject must as a minimum include:

- the contact details of the Data Privacy Manager, where applicable
- the purposes of the processing for which the personal data are intended as well as the legal basis for the processing
- the period for which the personal data will be stored
- the existence of the rights to request access, rectification, erasure or to object to the processing
- the categories of personal data concerned
- the recipients or categories of recipients of the personal data, where applicable
- any further information necessary to guarantee fair processing

2. Personal data can only be collected for specified, explicit and legitimate purposes

Data obtained for specified purposes must not be used for a purpose that differs from those formally notified to the Information Commissioner as part of Explore Learning's GDPR registration.

3. Personal data must be adequate, relevant and limited to what is necessary for processing

- The Data Privacy Manager is responsible for ensuring that information, which is not strictly necessary for the purpose for which it is obtained, is not collected.
- All data collection forms (electronic or paper-based), including data collection requirements in new informationsystems, must be approved by the Data Privacy Manager.
- The Data Privacy Manager will ensure that, on an annual basis all data collection methods are reviewed to ensure that collected data continues to be adequate, relevant and not excessive.

4. Personal data must be accurate and kept up to date

- Data that is kept for a long time must be reviewed and updated as necessary. No data should be kept unless it is reasonable to assume that it is accurate.
- Members should notify Explore Learning of any changes in circumstance to enable personal records to be updated accordingly.
- It is the responsibility of staff at Explore Learning to ensure that data held by Explore Learning is accurate and up to date. Completion of an appropriate registration or application form etc. will be taken as an indication that the data contained therein is accurate at the date of submission.

5.Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing

- Where personal data is retained beyond the processing date, it will be pseudonymised in order to protect the identity of the data subject in the event of a data breach.
- Personal data will be retained in line with the retention of records procedure and, once its retention date is passed, it must be securely destroyed as set out in this procedure.

6. Personal data must be processed in a manner that ensures its security

- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- These controls have been selected on the basis of identified risks to personal data, and the potential fordamage or distress to individuals whose data is being processed.
- Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the 'rights and freedoms' of data subjects in relation to the processing of personal data.
- The transfer of personal data outside of the EU is prohibited unless one or more of the specified safeguards or exceptions apply.

7. Accountability

The GDPR introduces the principle of accountability which states that the controller is not only responsible for ensuring compliance but for demonstrating that each processing operation complies with the requirements of the GDPR.

Specifically, controllers are required to maintain necessary documentation of all processing operations, implement appropriate security measures, perform DPIAs (Data Processing Impact Assessment), comply with requirements for priornotifications, or approval from supervisory authorities and appoint a Data Protection Officer if required.

8. Data subjects' rights

Data subjects have the following rights regarding data processing, and the data that is recorded about them:

- To make subject access requests regarding the nature of information held and to whom it has been disclosed.
- To prevent processing likely to cause damage or distress.
- To prevent processing for purposes of direct marketing.
- To be informed about the mechanics of automated decision-taking process that will significantly affect them.
- Not to have significant decisions that will affect them taken solely by automated process.
- To sue for compensation if they suffer damage by any contravention of the GDPR.
- To take action to rectify, block, erased, including the right to be forgotten, or destroy inaccurate data.
- To request the ICO to assess whether any provision of the GDPR has been contravened.
- The right for personal data to be provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller.
- The right to object to any automated profiling without consent.

9. Right to be forgotten

Data Subjects who wish to exercise their right to be forgotten can request this by contacting DPM@explorelearning.co.uk. However, due to our Ofsted registration, we are required to keep the following data for 2 years following cancellation of membership:

- The name, home address and date of birth of each member
- The name, home address and telephone number of parents/guardians of each member
- The right to be forgotten can be exercised after this 2 year period of non- membership. For any Data Subject who did not become a member of Explore Learning, a request for the right to be forgotten will be completed within 30days.
- A daily record of the names of the children and their hours of attendance will be kept for 3 years.
- After 3 years, member records will be archived and anonymised on our electronic membership system.

10. Complaints

Data Subjects who wish to complain to Explore Learning about how their personal information has been processed may lodge their complaint directly by email to DPM@explorelearning.co.uk Data subjects may also complain directly to the Information Commissioner's Office (ICO).

11. Consent

Explore Learning understands 'consent' to mean that it has been explicitly and freely given, specific, informed and unambiguous indication of the data subject's wishes by which they by statement, or by a clear affirmative action, signifies agreement to the processing of personal data relating to them. The consent of the data subject can be withdrawn at any time.

12. Security of data

All Employees are responsible for ensuring that any personal data which Explore Learning holds and for which they are responsible, is kept securely and is not under any conditions disclosed to any third party unless that third party has been specifically authorised to receive that information and has entered into a confidentiality agreement. Care must be taken to ensure that PC screens and terminals are not visible except to authorised Employees. Manual records may not be left where they can be accessed by unauthorised personnel and may not be removed from business premises without explicit authorisation. As soon as manual records are no longer required for day-to-day membership support, they should be archived. Personal data may only be deleted or disposed of in line with the Data Retention Procedure. Manual records that have reached their retention date are to be shredded and disposedof as 'confidential waste'.

13. Rights of access to data

Data subjects have the right to access any personal data (i.e. data about them) which is held in electronic format and manual records which form part of a relevant filing system.
To obtain a copy of the personal information we hold about you, please email DPM@explorelearning.co.uk

Cookies

What are cookies?

A cookie is a small data file that is placed and stored on your device (computer, smartphone, tablet etc.) when you visit awebsite. When you visit explorelearning.co.uk we may automatically collect information that allows us to recognise andremember you through cookies.

How do we use cookies?

We use cookies in a variety of ways:

- Understanding how you use our site
- Analysing our communication with you
- Working with third party companies to serve you relevant advertising on other sites

What types of cookies do we use?

There are three main types that require consent.

- Functionality cookies – these allow you to navigate the site and use our features, such as the members' area and 'find a centre' location search.
- Analytics or performance cookies – these cookies allow us to measure and analyse how our customers use the site, to improve both its functionality and your experience.
- Targeting or advertising cookies – these are used to deliver adverts relevant to you and help us measure the effectiveness of our marketing campaigns.

How to manage cookies

You can manage cookies by changing your browser's cookie settings. These settings are usually found in the 'options' 'help' or 'preferences' menu of your browser.

If you would like to know more visit our cookie policy. This is available on our website.

Updates to this policy

This policy is reviewed frequently and updated on the Explore Learning website. You may therefore want to visit our website regularly to view our most up to date policy.

Contact us

If you would like to contact us about any aspect of this Privacy Policy, please email DPM@explorelearning.co.uk

PRIVACY POLICY FOR EMPLOYEES

Our commitment to keeping your data safe.

Explore Learning is committed to protecting the privacy and security of your personal information.

This privacy notice explains how we collect and use your personal information during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all job applicants and employees at Explore Learning.

Explore Learning is a "data controller" and a 'data processor'' under the GDPR. This means that we take our responsibility seriously, recognising the importance of keeping your personal information safe and secure.
This notice applies to job applicants, current and former employees. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.
It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data protection principles

We will comply with GDPR law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
There are "special categories" of more sensitive personal data which require a higher level of protection.
We may collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- Beneficiaries
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Copy of driving licence
- Recruitment information (including copies of right to work documentation, qualification certification, references and other information included in a CV or cover letter or as part of the application process)

- Employment records (including job titles, work history, working hours, training re cords and professional memberships)
- Compensation history
- Performance information
- Disciplinary and grievance information
- CCTV footage and other information obtained through electronic means
- Information about your use of our information and communications systems
- Photographs

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences

How is your personal information collected?

We collect personal information about job applicants, employees, workers and contractors through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers or other background check/ vetting agencies e.g. Access HR Solutions Disclosure Barring Services (DBS).

We will collect additional personal information in the course of job-related activities throughout the period of you working for us.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

4. We may also use your personal information in the following situations, which are likely to be rare:

5. Where we need to protect your interests (or someone else's interests).
6. Where it is needed in the public interest [or for official purposes].

Situations in which we will use your personal information

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Providing any relevant employee benefits.
- Liaising with your pension provider.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.

- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our employees).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.

Our obligations as an employer

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws.

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to provide benefits.
- We will use information about your gender, race or national or ethnic origin, to ensure meaningful equal opportunity monitoring and reporting.

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and to meet our Ofsted Voluntary Childcare Registration requirements. We will do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.
We may hold information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you during the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- To determine your suitability to fulfil the requirements of the role.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.
We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so e.g. Access HR Solutions (DBS) & Ofsted.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents) and other entities within our group.

The following activities are carried out by third-party service providers:

ICIMS & other recruitment partners/platforms – Applicant Tracking system for recruitment, selection & attraction purposes
Payroll – Access Group (Select HR and Select Pay Bureau)
Disclosure Barring Services – Access Group
Pension – Standard Life
Vitality & Health insurance – Pru Health
Life Assurance - One Pension Consultancy
Prodeceo – Training Platform
Ofsted – Voluntary Childcare Register & Safeguarding
Tastecard – Explore & Tastecard corporate offer
Cycle to Work – CycleScheme
Explore Learning email – Microsoft
Give as you Earn – Charity Aid Foundation (CAF)
Social media – Facebook, LinkedIn, Instagram
Appcast – programmatic advertising
Google Analytics – marketing analysis
Hubspot – marketing communications

Job applicants – when you express interest in working for Explore Learning, we will collect & process the following data form you;

Your name, postal and email address, contact phone numbers
Curriculum Vitae
Evidence of right to work in the UK
Maths and English GCSE grades or equivalent
Equal Opportunities data including gender, sexual orientation, ethnic origin, health and wellbeing, age and religion. All candidates can opt out of these questions. If answered they remain anonymous and are collected for data purposes only
Information about any reasonable adjustments to support candidates with their application process or employment

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When you register to apply for a role, Explore Learning will use the information you provide to process your application for employment. This may include verifying educational background, employment history and for any other purposes involved in the recruitment procedure.

Your personal details may be held, processed and disclosed to third parties, both electronically and manually, by Explore Learning or by our subsidiaries and affiliates for purposes which include:

1. Explore Learning administration and management of its employees, prospective employees and our business.
2. For compliance with applicable procedures, laws and regulations to which Explore Learning is subject.
3. For the purposes of obtaining confidential feedback from you on the recruitment system process for purposes of future system improvement.

If your application is unsuccessful, Explore Learning may hold your application and the information contained therein for up to 3 years.

Cookies

A cookie is a small text file that we store on your device. Our website uses cookies to distinguish you from other users of our website. Cookies also provide us with information about how this website is used so we can keep it as up to

date, relevant and error-free as possible. Our use of cookies also allows registered users to be presented with a personalised version of the site, carry out transactions and have access to information about their account.

Most browsers will allow you to turn off cookies. If you want to know how to do this, please look at the menu on your browser or look at the instruction on https://allaboutcookies.org/. Please note however that turning off cookies will restrict your use of our website. Further information about the types of cookies that may be used on this website is set out in the list below.

- Strictly necessary cookies – these are cookies that are essential to the operation of our website
- Analytical/performance cookies. These cookies allow us to recognise and count the number of visitors to our website.
- Functionality cookies – These cookies are used to recognise you when you return to our website.
- Targeting Cookies – These cookies record your visit to our website, the pages you have visited and the links you have followed.

We may monitor traffic to our site and collect the following information:

- The IP address of your computer
- The referring website from which you have got to our website from

The reasons for this are:

- To make ongoing improvements to our website based on this data
- To see our most popular sources of applications

Data security

We have put in place measures to protect the security of your information. Details of these measures are available in our Policies and Procedures found on the company intranet.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Details of retention periods for different aspects of your personal information are available in our policies & procedures (employee files need to be retained for 3 years from the end of their employment).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be

associated with you, in which case we may use such information without further notice to you. Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy **OR** applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request deletion** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the People Operations Team via peopleops@explorelearning.co.uk

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. We may contact you about available vacancies via email. If you are a prospective employee, you can unsubscribe from any mass email communications through the candidate dashboard. Here you are also able to revoke consent and make data subject requests. For current employees with specific data requests, this can be done by contacting the People Operations team.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a task force of data privacy champions to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact DPM@explorelearning.co.uk
You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact DPM@explorelearning.co.uk