



EDIFY
ACADENY

Child Protection and Safeguarding Policy

(Tuition and Education Provision)

Provision: In-person tuition (1:1 and small groups)

Age range: 12–18

Applies to: Directors, leadership, employees, contractors, volunteers, and anyone working on behalf of Edify Academy

Scope: Safeguarding responsibilities apply during the provision of tuition services and associated activities only

Last reviewed: December 2025

Next review due: December 2026

IMPORTANT SAFEGUARDING CONTACTS

Designated Safeguarding Lead (DSL): Edify Leadership (SJ)

Safeguarding email: safeguarding@edifyacademy.co.uk

If a child is in immediate danger or at risk of serious harm, call 999.

Safeguarding concerns must be referred to Children's Social Care for the local authority where the child normally resides. Where appropriate, concerns may also be referred to the police or the Channel programme.

****SECTION 1**

PURPOSE, SAFEGUARDING ETHOS AND ORGANISATIONAL COMMITMENT**

1.1 Introduction

Edify Academy is committed to safeguarding and promoting the welfare of children and young people and recognises that safeguarding is a fundamental responsibility that underpins all aspects of its work. This commitment applies to every individual who works

for, with, or on behalf of Edify Academy, regardless of role, status, or contractual arrangement.

Safeguarding is not a standalone activity or a matter of compliance alone. It is a core organisational value that informs how Edify Academy recruits' staff, designs and delivers tuition services, establishes professional boundaries, communicates with children and families, and responds to concerns about a child's safety or wellbeing.

This policy sets out how Edify Academy takes **reasonable, proportionate, and legally defensible steps** to safeguard children during the delivery of tuition services. It is intended to provide clarity for staff and leadership, consistency in practice, and confidence for external stakeholders that safeguarding responsibilities are understood and acted upon appropriately.

1.2 Scope of safeguarding responsibility

Edify Academy provides in-person tuition and academic support to young people aged **12–18**, delivered through **one-to-one sessions and small group provision**, without fixed cohorts. Safeguarding responsibilities therefore arise within a specific and defined context.

For the purposes of this policy, Edify Academy's safeguarding duties apply:

- during scheduled tuition sessions
- during associated activities that form part of the tuition service
- during professional communication connected to tuition provision

Edify Academy does not assume responsibility for children outside the scope of its tuition provision. Parents and carers retain primary responsibility for the child outside scheduled sessions, including travel to and from sessions, personal care, and supervision beyond tuition hours, unless otherwise explicitly agreed in writing.

This clear definition of scope is essential to ensure safeguarding responsibilities are **understood, manageable, and realistic**, and to avoid creating duties that Edify Academy cannot reasonably fulfil.

1.3 Safeguarding as a shared responsibility

Safeguarding is everyone's responsibility. While specific safeguarding roles exist within Edify Academy, including the Designated Safeguarding Lead (DSL), no individual should assume that safeguarding concerns are someone else's responsibility.

All adults working with Edify Academy are expected to:

- remain vigilant to the possibility that a child may be at risk of harm
- understand that abuse and neglect can occur in any context
- recognise that safeguarding concerns may arise gradually or indirectly
- act promptly when concerns arise

A failure to act, delay, or assumption that another person will intervene can place a child at increased risk. For this reason, Edify Academy promotes a culture where **raising concerns is encouraged, supported, and viewed as a protective act**, not as an accusation or criticism.

1.4 Safeguarding culture and professional judgement

Edify Academy recognises that safeguarding cannot be reduced to a checklist or a series of procedural steps alone. While procedures are essential, effective safeguarding also relies on professional judgement, curiosity, and reflective practice.

Staff are expected to apply this policy with an understanding that:

- children may not disclose abuse directly
- safeguarding concerns often involve patterns rather than single incidents
- behaviour, attendance, engagement, or emotional presentation may indicate underlying harm
- a child's circumstances may change over time

Staff are encouraged to ask appropriate questions, seek advice from the DSL, and reflect on whether concerns may be indicative of wider safeguarding issues, even where evidence is incomplete or uncertainty exists.

1.5 Proportionate safeguarding in a tuition setting

Edify Academy is not a school and does not operate as a registered education setting. However, it recognises that tuition providers still play a critical role in safeguarding, particularly where they work closely with children on a one-to-one basis or in small groups.

This policy is informed by statutory safeguarding guidance, including *Keeping Children Safe in Education* and *Working Together to Safeguard Children*, but is **applied proportionately** to the nature of Edify Academy's provision.

Proportionate safeguarding means:

- recognising the limits of Edify Academy's role and authority

- avoiding school-only statutory duties that do not apply
- focusing on realistic, effective safeguarding actions
- ensuring safeguarding arrangements are robust without being excessive

This approach ensures that safeguarding practice is both effective and defensible.

1.6 Safeguarding and duty of care

Edify Academy owes a duty of care to children during the delivery of tuition services. This duty requires the organisation to take **reasonable steps** to prevent foreseeable harm and to respond appropriately when safeguarding concerns arise.

The duty of care does not require Edify Academy to guarantee a child's safety or to eliminate all risk. Instead, it requires that safeguarding arrangements are reasonable, proportionate, and informed by relevant guidance and professional standards.

This policy is designed to support staff in understanding what is expected of them and to ensure that decisions and actions taken in response to safeguarding concerns can be clearly explained and justified if scrutinised.

1.7 Safeguarding and equality

Edify Academy is committed to safeguarding all children equally and recognises that some children may be at greater risk of harm or face additional barriers to disclosure.

Safeguarding practice must be inclusive and responsive to individual needs, taking into account factors such as:

- special educational needs or disabilities
- mental health difficulties
- language or communication barriers
- socio-economic circumstances
- looked-after or previously looked-after status
- experiences of discrimination or marginalisation

Staff must be alert to the possibility that safeguarding concerns may present differently for different children and must avoid assumptions that minimise or dismiss risk.

1.8 Early identification and prevention

Edify Academy recognises the importance of early identification of safeguarding concerns and the role that tuition providers can play in noticing changes or patterns that may not be visible elsewhere.

While Edify Academy is not responsible for statutory early help provision, it recognises that raising concerns early and sharing information appropriately can contribute to preventing harm and supporting children more effectively.

Staff are encouraged to report concerns even where they are uncertain about thresholds or outcomes. The DSL will provide guidance on appropriate next steps.

1.9 Commitment to training and continuous improvement

Edify Academy is committed to ensuring that safeguarding practice remains current, effective, and responsive to emerging risks.

This includes:

- providing safeguarding training and updates to staff
- reviewing safeguarding practice following incidents or concerns
- monitoring changes in safeguarding legislation and guidance
- reflecting on lessons learned and adapting procedures accordingly

Safeguarding is a dynamic area of practice, and Edify Academy recognises the importance of continuous learning and improvement.

1.10 Policy status and authority

This policy has been approved by Edify Academy leadership and applies to all safeguarding-related activity within the organisation.

Failure to comply with this policy may result in disciplinary action, termination of contracts, or referral to relevant authorities where appropriate.

This policy should be read in conjunction with related organisational policies and procedures, including those covering professional conduct, recruitment, data protection, and complaints.

****SECTION 2**

LEGAL, STATUTORY AND REGULATORY FRAMEWORK**

2.1 Purpose of this section

This section explains the legal and statutory framework that informs Edify Academy's safeguarding and child protection arrangements. It clarifies **which guidance applies, how it applies, and where it is applied proportionately** to reflect Edify Academy's role as a tuition and education provider rather than a school.

By setting this out clearly, Edify Academy ensures that safeguarding practice is grounded in current law and guidance, while avoiding the creation of duties that are not legally required or realistically deliverable within a tuition setting.

2.2 Children Act 1989 and Children Act 2004

The Children Act 1989 establishes the foundational legal framework for safeguarding children in England. It places a duty on organisations and individuals to consider the welfare of children and to act where there are concerns that a child is suffering or is likely to suffer significant harm.

The Children Act 2004 builds on this framework by emphasising **inter-agency cooperation** and shared responsibility for safeguarding outcomes.

While Edify Academy does not hold statutory child protection powers, it recognises its responsibility to:

- identify safeguarding concerns
- share information appropriately
- cooperate with children's social care, police, and other agencies

Where Edify Academy becomes aware of concerns that a child may be at risk of significant harm, it will act promptly in line with local safeguarding arrangements and statutory thresholds.

2.3 Working Together to Safeguard Children

Working Together to Safeguard Children sets out how organisations should work together to protect children and promote their welfare.

Edify Academy is not a statutory safeguarding partner; however, it recognises that **non-statutory education providers play an important role** in identifying concerns and contributing to early intervention and child protection processes.

In line with *Working Together*, Edify Academy commits to:

- sharing information in a timely and appropriate manner
- cooperating with safeguarding enquiries and assessments

- respecting the roles and responsibilities of statutory agencies
- acting in the best interests of the child

Staff are expected to follow the advice of the Designated Safeguarding Lead when engaging with multi-agency processes and to provide factual, accurate information when requested.

2.4 Keeping Children Safe in Education (KCSIE)

Keeping Children Safe in Education (KCSIE) is statutory guidance for schools and colleges. While Edify Academy is **not a school** and is **not directly subject to the statutory duties within KCSIE**, the document is widely recognised as setting out **best practice safeguarding standards** within educational contexts.

Edify Academy therefore uses KCSIE as an **informing framework**, applied proportionately to a tuition provider.

This means that Edify Academy:

- aligns safeguarding principles with KCSIE where appropriate
- adopts safeguarding definitions and thresholds where relevant
- applies expectations in a way that reflects the scale and nature of tuition provision

Edify Academy does **not** claim full statutory compliance with KCSIE and does **not** import school-specific duties such as governing body requirements, curriculum obligations, attendance enforcement, or inspection frameworks.

This proportionate approach ensures safeguarding practice is robust while remaining legally accurate.

2.5 Safeguarding Vulnerable Groups Act 2006 and DBS requirements

The Safeguarding Vulnerable Groups Act 2006 provides the legal framework for preventing unsuitable individuals from working with children.

Edify Academy recognises the importance of safer recruitment and appropriate vetting, particularly given the nature of tuition provision, which may involve one-to-one contact with children.

In line with this framework, Edify Academy:

- assesses whether roles constitute regulated activity
- undertakes Disclosure and Barring Service (DBS) checks where appropriate

- ensures that recruitment decisions prioritise safeguarding considerations
- does not permit unsupervised work with children until required checks are completed

Safer recruitment processes are designed to reduce risk but are not relied upon as the sole safeguarding measure. Ongoing supervision, conduct expectations, and safeguarding culture are equally important.

2.6 Counter-Terrorism and Security Act 2015 (Prevent Duty)

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including education providers, to have due regard to the need to prevent people from being drawn into terrorism.

While the application of the Prevent Duty varies depending on the type of education provider, Edify Academy recognises its responsibility to:

- be alert to signs that a child may be vulnerable to radicalisation
- provide staff with appropriate awareness training
- ensure concerns are reported and escalated appropriately

Prevent-related concerns are treated as safeguarding concerns and managed through the same reporting and referral processes outlined in this policy.

2.7 Female Genital Mutilation (FGM)

FGM is a criminal offence and a form of child abuse.

Edify Academy recognises its duty to act where there are concerns that a child may be at risk of FGM or where FGM is known or suspected to have taken place.

Staff must report any concerns relating to FGM to the Designated Safeguarding Lead immediately. Where mandatory reporting duties apply, appropriate referrals to the police will be made in line with statutory guidance.

2.8 Data Protection Act 2018 and UK GDPR

Safeguarding practice involves the processing of sensitive personal data. Edify Academy recognises its obligations under the Data Protection Act 2018 and UK GDPR to process personal data lawfully, fairly, and securely.

Importantly, data protection legislation **does not prevent** the sharing of information where this is necessary to safeguard a child.

Edify Academy ensures that:

- safeguarding information is shared on a need-to-know basis
- records are stored securely
- decisions to share information are proportionate and justifiable

Safeguarding considerations always take precedence where there is a risk of harm to a child.

2.9 Equality Act 2010

The Equality Act 2010 requires organisations to avoid discrimination and to make reasonable adjustments where necessary.

Edify Academy recognises that safeguarding practice must be inclusive and responsive to individual needs. Safeguarding arrangements are adapted to ensure that children are not disadvantaged or placed at increased risk due to protected characteristics, disabilities, or additional needs.

2.10 Human Rights Act 1998

The Human Rights Act 1998 underpins safeguarding practice by balancing the rights of the child with the rights of others.

Edify Academy recognises that safeguarding decisions may involve balancing:

- the child's right to safety and protection
- the right to privacy and family life
- the principle of proportionality

Safeguarding decisions are made with careful consideration of these factors and with the child's welfare as the paramount consideration.

2.11 Local safeguarding arrangements

Edify Academy operates within local safeguarding arrangements established by safeguarding partners in each local authority area.

The Designated Safeguarding Lead is responsible for:

- understanding local referral pathways
- ensuring referrals are made to the correct local authority
- maintaining awareness of local thresholds and procedures

Where Edify Academy works with children from multiple local authority areas, safeguarding decisions are based on the child's home local authority unless advised otherwise by statutory agencies.

2.12 Review and updating of legal framework

Safeguarding legislation and guidance evolve over time. Edify Academy is committed to keeping this policy under regular review to ensure continued compliance and best practice.

Changes in legislation, statutory guidance, or local safeguarding arrangements will be reflected in policy updates and staff briefings as appropriate.

****SECTION 3**

DEFINITIONS, KEY SAFEGUARDING CONCEPTS AND THRESHOLDS**

3.1 Purpose of this section

Clear definitions are essential to effective safeguarding. Without a shared understanding of what safeguarding terms mean in practice, there is a risk that concerns are misunderstood, minimised, or handled inconsistently.

This section sets out the key safeguarding concepts used throughout this policy, explains how they apply within Edify Academy's tuition provision, and clarifies how safeguarding thresholds are understood and applied.

Staff are not expected to make legal determinations or diagnoses. However, they are expected to understand the **meaning of safeguarding terms**, to recognise potential indicators of harm, and to know when and how to escalate concerns.

3.2 Safeguarding and promoting the welfare of children

For the purposes of this policy, **safeguarding and promoting the welfare of children** means:

- protecting children from maltreatment, abuse and neglect
- preventing impairment of children's mental and physical health or development
- ensuring children receive safe and effective care during the provision of tuition services

- taking appropriate action to enable children to achieve the best possible outcomes

Safeguarding is both **protective** (responding to harm or risk of harm) and **preventative** (acting early to reduce the likelihood of harm).

In a tuition setting, safeguarding often involves noticing subtle changes over time, such as shifts in behaviour, engagement, mood, or communication, particularly in one-to-one work where a child may feel more able to express concerns.

3.3 Child protection

Child protection is a specific aspect of safeguarding and refers to activities undertaken to protect a child who is suffering, or is likely to suffer, **significant harm**.

Child protection action may involve:

- referral to Children's Social Care
- involvement of the police
- multi-agency assessment or intervention

While Edify Academy does not have statutory child protection powers, it plays a crucial role in identifying concerns and sharing information with statutory agencies.

Staff should understand that child protection concerns require **immediate action**, even where information is incomplete or uncertain.

3.4 The child

For the purposes of this policy, a **child** is any person under the age of 18.

This policy applies to all children receiving services from Edify Academy, regardless of perceived maturity, academic ability, or independence.

Older adolescents (including those aged 16–17) may still be vulnerable to abuse, exploitation or neglect, and safeguarding responsibilities remain fully applicable.

3.5 Abuse and neglect – overview

Abuse is a form of maltreatment of a child. Someone may abuse a child by inflicting harm, or by failing to act to prevent harm.

Abuse may be perpetrated by:

- adults

- other children
- individuals known to the child
- individual's unknown to the child

Abuse can occur:

- within the family
- within educational or community settings
- online or through digital platforms

Staff must understand that abuse does not always involve physical injury and may be hidden, cumulative, or emotionally harmful.

3.6 Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates symptoms of illness or deliberately induces illness in a child.

Indicators may include unexplained injuries, inconsistent explanations, or patterns of injury. However, physical abuse may also occur without visible injury.

In a tuition context, staff should remain alert to:

- repeated injuries or explanations that do not align
- visible distress around physical contact
- sudden changes in physical presentation or behaviour

Any concerns must be reported promptly.

3.7 Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and adverse effects on emotional development.

This may include:

- conveying to a child that they are worthless or unloved
- inappropriate expectations or pressure

- humiliation, intimidation, or isolation
- exposing a child to domestic abuse
- serious bullying, including online bullying

Emotional abuse may be particularly difficult to identify, as it often occurs over time and without physical evidence.

Staff should be attentive to indicators such as withdrawal, anxiety, low self-esteem, or extreme responses to perceived failure, particularly where these persist or escalate.

3.8 Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening.

This includes:

- physical sexual acts
- non-contact activities such as involving children in looking at or producing sexual images
- online sexual abuse and grooming

Sexual abuse can be perpetrated by adults or by other children and may involve coercion, manipulation, or abuse of power.

Staff must never attempt to investigate sexual abuse concerns themselves. Any disclosure or suspicion must be reported immediately to the Designated Safeguarding Lead.

3.9 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of health or development.

Neglect may include failure to:

- provide adequate food, clothing or shelter
- protect a child from physical or emotional harm
- ensure adequate supervision
- provide access to medical care or treatment
- meet a child's emotional needs

In a tuition setting, neglect may be identified through patterns rather than isolated incidents, such as consistent tiredness, hunger, lack of appropriate clothing, or repeated failure to engage with education.

3.10 Child sexual exploitation (CSE)

Child sexual exploitation is a form of sexual abuse where children are manipulated or coerced into sexual activity in exchange for something the child needs or wants, or for the financial advantage of the perpetrator.

CSE may involve:

- online grooming
- older peers or adults exploiting vulnerability
- coercion, threats, or violence

Children may not recognise CSE as abuse and may appear to consent. Consent does not remove the exploitative nature of the abuse.

3.11 Child criminal exploitation (CCE)

Child criminal exploitation occurs where a child is coerced, controlled or manipulated into criminal activity.

This may include:

- county lines activity
- transporting drugs or weapons
- theft or other criminal acts

Children involved in CCE may appear to be offenders but are often victims of exploitation.

Staff should be alert to unexplained money, changes in behaviour, increased secrecy, or association with older individuals.

3.12 Online abuse and safeguarding

Abuse may occur online through social media, messaging platforms, gaming, or other digital environments.

Online abuse may include:

- grooming
- sexual exploitation
- harassment or bullying
- exposure to harmful content
- coercion or blackmail

Online safeguarding concerns are treated with the same seriousness as offline concerns and are managed through the same reporting procedures.

3.13 Child-on-child abuse

Children can abuse other children. This may occur in person or online and may include:

- physical abuse
- sexual violence or harassment
- bullying or cyberbullying
- coercive or controlling behaviour

Child-on-child abuse is never dismissed as “banter” or “experimentation”. All such concerns are managed as safeguarding issues.

3.14 Thresholds and professional judgement

Safeguarding concerns exist on a continuum, from emerging worries to significant harm.

Staff are **not** expected to determine thresholds for statutory intervention. However, they are expected to:

- report concerns promptly
- share information factually
- seek advice from the DSL

The DSL is responsible for determining appropriate action, including referral to Children’s Social Care or other agencies.

When in doubt, concerns should always be shared rather than withheld.

3.15 Early help and cumulative harm

Harm may result from a single incident or from cumulative factors over time.

Edify Academy recognises the importance of early identification and intervention, particularly where concerns may not yet meet statutory thresholds but indicate vulnerability.

Staff should report patterns, repeated concerns, or changes over time to the DSL.

3.16 Safeguarding and context

Safeguarding concerns must always be considered in context.

This includes understanding:

- the child's family circumstances
- peer relationships
- online activity
- community or environmental factors

Contextual safeguarding recognises that harm may occur outside the family but still significantly affect the child's safety and wellbeing.

****SECTION 4**

EQUALITY, INCLUSION, VULNERABILITY AND BARRIERS TO SAFEGUARDING**

4.1 Purpose of this section

Effective safeguarding cannot be separated from equality and inclusion. Children's experiences of harm, risk, and disclosure are shaped by personal, social, and structural factors. This section explains how Edify Academy recognises and responds to **differing levels of vulnerability**, and how safeguarding practice is adapted to ensure that all children are protected equitably.

This section also addresses the reality that some children face **additional barriers to being seen, heard, or believed**, particularly in education and tuition contexts.

4.2 Equality and safeguarding responsibilities

Edify Academy is committed to safeguarding all children without discrimination and in accordance with the principles of the Equality Act 2010. Safeguarding practice must be fair, inclusive, and responsive to individual needs, rather than based on assumptions or stereotypes.

Safeguarding responsibilities apply equally to all children, regardless of background, identity, or personal circumstances. However, equal treatment does not always mean identical treatment. In safeguarding practice, equity often requires **reasonable adjustments** to ensure that children can access support, communicate concerns, and remain safe.

Staff must therefore be aware of how safeguarding risks may be heightened or obscured by inequality, discrimination, or marginalisation.

4.3 Understanding vulnerability

Vulnerability is not a fixed characteristic. A child may be vulnerable due to a single factor, a combination of factors, or changing circumstances over time.

Edify Academy understands vulnerability as **contextual and dynamic**, rather than inherent to the child. This means that safeguarding assessments consider the child's environment, relationships, experiences, and access to support.

Children may be more vulnerable where they:

- experience instability at home
- have unmet emotional or mental health needs
- are socially isolated
- depend heavily on adults for support
- lack trusted adults outside the tuition setting

Staff should avoid categorising children as “vulnerable” in a way that defines or limits them. Instead, vulnerability should inform **protective action**, not stigma.

4.4 Children with special educational needs and disabilities (SEND)

Children with special educational needs and disabilities may face **increased safeguarding risks** and **additional barriers to disclosure**. These risks do not arise from the child's needs themselves, but from factors such as dependence on adults, communication difficulties, social isolation, or assumptions about behaviour.

In a tuition context, staff may work closely with children who:

- have communication differences
- struggle to articulate distress
- display behaviour that could mask underlying safeguarding concerns

Edify Academy expects staff to:

- remain alert to signs of abuse or neglect that may be misinterpreted as behavioural or developmental issues
- avoid making assumptions about the cause of behaviour
- adapt communication methods where necessary
- seek advice from the DSL where concerns arise

Safeguarding concerns involving children with SEND must be taken just as seriously as those involving any other child.

4.5 Mental health and emotional wellbeing

Mental health difficulties can both **increase vulnerability to harm** and be a **sign that harm is occurring**. Edify Academy recognises that anxiety, depression, self-harm, disordered eating, or emotional distress may overlap with safeguarding concerns.

In a tuition setting, children may disclose mental health struggles during academic discussions or present through changes in engagement, motivation, or behaviour.

Staff are expected to:

- treat significant mental health concerns as potentially safeguarding-related
- avoid dismissing distress as “academic stress” without reflection
- report concerns to the DSL where there is risk of harm or self-harm

While Edify Academy does not provide therapeutic services, it recognises its responsibility to act where mental health concerns raise safeguarding risks.

4.6 Looked-after and previously looked-after children

Looked-after and previously looked-after children may have experienced trauma, instability, or disrupted relationships. These experiences can increase vulnerability to abuse, exploitation, or emotional harm.

Where Edify Academy is aware that a child is looked-after or previously looked-after, safeguarding practice must reflect this increased vulnerability.

The DSL will consider:

- the child’s care status when making safeguarding decisions
- the importance of information sharing with relevant professionals

- the need for additional sensitivity and consistency

Staff should understand that trust may take time to develop and that behaviour may reflect past experiences rather than current intent.

4.7 Children with a social worker

The presence of a social worker indicates that a child may be experiencing, or has experienced, significant challenges.

Where Edify Academy is aware that a child has a social worker, this information will be taken into account in safeguarding decision-making. This may influence:

- responses to attendance or disengagement
- consideration of cumulative harm
- escalation thresholds

Edify Academy will cooperate with statutory agencies where appropriate, while maintaining clear boundaries regarding its role as a tuition provider.

4.8 LGBTQ+ children

Edify Academy recognises that LGBTQ+ children may face increased risks, including bullying, harassment, family rejection, and mental health difficulties. These risks may be compounded where a child feels unable to disclose their identity or experiences.

Safeguarding practice must be respectful, non-judgemental, and child-centred. Staff must not make assumptions about a child's identity or experiences and must ensure that any safeguarding concerns are addressed sensitively.

Concerns involving bullying, harassment, or emotional harm linked to sexual orientation or gender identity must be treated as safeguarding issues where appropriate.

4.9 Cultural, religious and family contexts

Safeguarding concerns may arise in a variety of cultural, religious, or family contexts. Edify Academy recognises the importance of respecting diversity while maintaining a clear safeguarding focus.

Cultural or religious beliefs must never be used to justify harm or to prevent protective action. Where concerns arise, the child's safety and welfare remain the paramount consideration.

Staff should approach such situations with sensitivity and professionalism, seeking guidance from the DSL where uncertainty exists.

4.10 Language barriers and communication needs

Children who face language barriers or communication difficulties may find it harder to disclose concerns or may rely on non-verbal cues to express distress.

Edify Academy expects staff to:

- remain attentive to changes in behaviour or engagement
- avoid assuming understanding
- seek support or advice where communication barriers may impede safeguarding

Safeguarding action should not be delayed due to communication difficulties.

4.11 Poverty, deprivation and contextual risk

Socio-economic factors such as poverty, housing instability, or lack of access to resources can increase vulnerability to neglect, exploitation, or emotional harm.

Staff should avoid judgement and recognise that safeguarding concerns may arise from stressors beyond the child's control.

Safeguarding decisions should be informed by an understanding of the child's broader context and should aim to support rather than punish.

4.12 Barriers to disclosure

Children may not disclose safeguarding concerns for many reasons, including:

- fear of not being believed
- fear of consequences for themselves or others
- loyalty to family members or peers
- shame or embarrassment
- lack of trust in adults
- previous negative experiences of disclosure

In a tuition setting, disclosures may occur gradually or indirectly. Staff must be patient, attentive, and responsive, and must avoid pressing children for information.

4.13 Creating a safe environment for disclosure

Edify Academy is committed to creating an environment where children feel safe to speak.

This includes:

- respectful and professional interactions
- predictable routines within tuition sessions
- clear boundaries
- staff who listen and take concerns seriously

Staff must understand that how they respond to small concerns can influence whether a child feels able to disclose more serious issues.

4.14 Professional curiosity and respectful challenge

Safeguarding requires professional curiosity — a willingness to question, reflect, and seek further information where something does not feel right.

Staff are encouraged to:

- ask appropriate questions
- share concerns with the DSL
- challenge assumptions respectfully

Professional curiosity must always be exercised with respect and without accusation.

4.15 Summary

Equality and inclusion are central to effective safeguarding. By recognising vulnerability, addressing barriers to disclosure, and adapting safeguarding practice to individual needs, Edify Academy aims to ensure that all children are protected and supported appropriately.

****SECTION 5**

ROLES, RESPONSIBILITIES AND SAFEGUARDING ACCOUNTABILITY**

5.1 Purpose of this section

Clear allocation of safeguarding responsibilities is essential to ensure that concerns are identified, escalated, and managed effectively. Ambiguity about who is responsible for what can lead to delay, inaction, or unsafe decision-making.

This section explains how safeguarding responsibility is structured within Edify Academy, clarifies expectations for all adults working with the organisation, and sets out how accountability for safeguarding is maintained at leadership level.

Safeguarding responsibility is **shared**, but accountability must be **clear**.

5.2 Safeguarding as a collective responsibility

All adults working for or on behalf of Edify Academy have a responsibility to safeguard children. This responsibility applies regardless of:

- role or seniority
- employment status (employee, contractor, volunteer)
- length of engagement with the organisation

Safeguarding is not confined to designated roles. Every adult is expected to remain vigilant, act in the best interests of children, and take appropriate action when concerns arise.

Failure to act on safeguarding concerns, or assuming that another person will intervene, places children at increased risk and may result in disciplinary or contractual action.

5.3 Responsibilities of all adults working with Edify Academy

All adults working with Edify Academy are required to:

- read, understand and comply with this safeguarding policy
- understand the signs and indicators of abuse, neglect and exploitation
- maintain professional boundaries at all times
- act with integrity, professionalism and respect
- report safeguarding concerns immediately in line with this policy
- record concerns factually, accurately and promptly
- participate in safeguarding training and updates

Adults must understand that safeguarding concerns may arise through:

- direct disclosure by a child
- indirect comments or behaviour
- observation of changes over time

- information shared by parents, carers or other professionals

Adults are **not** expected to investigate concerns or determine outcomes. Their responsibility is to **recognise, record, and report**.

5.4 Professional boundaries and conduct

Given the nature of tuition provision, which often involves close working relationships and one-to-one sessions, maintaining professional boundaries is critical to safeguarding.

All adults must:

- maintain an appropriate professional relationship with children
- avoid over-familiarity, favouritism or dependency
- ensure interactions remain focused on educational support
- use approved communication channels only
- avoid private or informal contact outside agreed arrangements

Professional boundaries protect both children and adults and are essential to maintaining trust, transparency and safety.

5.5 Designated Safeguarding Lead (DSL)

Edify Academy appoints a **Designated Safeguarding Lead (DSL)** who has lead responsibility for safeguarding and child protection across the organisation.

The DSL is responsible for ensuring that safeguarding concerns are handled consistently, appropriately, and in line with statutory guidance and local safeguarding arrangements.

5.6 Core responsibilities of the DSL

The DSL's responsibilities include:

- acting as the primary point of contact for safeguarding advice and concerns
- receiving and reviewing safeguarding reports from staff
- assessing information and determining appropriate next steps
- making referrals to Children's Social Care, police or other agencies where required
- ensuring referrals are made promptly and appropriately

- maintaining secure and accurate safeguarding records
- monitoring patterns of concern and cumulative risk
- providing guidance and support to staff
- liaising with safeguarding partners and external agencies
- ensuring safeguarding considerations are embedded within tuition delivery

The DSL must exercise professional judgement and act in the best interests of the child at all times.

5.7 Authority and resourcing of the DSL

For safeguarding arrangements to be effective, the DSL must be given:

- sufficient authority to make safeguarding decisions
- adequate time to fulfil safeguarding responsibilities
- access to appropriate training and updates
- support from leadership when escalating concerns

Edify Academy leadership is responsible for ensuring that the DSL is properly supported and able to carry out the role effectively.

5.8 Deputy Designated Safeguarding Lead (DDSL)

Edify Academy appoints a **Deputy Designated Safeguarding Lead (DDSL)** to support the DSL and provide continuity during periods of absence.

The DDSL:

- supports the DSL in managing safeguarding concerns
- acts in the DSL's role when the DSL is unavailable
- receives appropriate safeguarding training

All staff must know how to contact the DSL or DDSL and must not delay reporting concerns due to uncertainty about availability.

5.9 Leadership and internal governance responsibilities

Overall accountability for safeguarding rests with Edify Academy leadership, including directors, owners, or equivalent internal governance arrangements.

Leadership responsibilities include:

- ensuring effective safeguarding policies and procedures are in place
- appointing a suitably trained DSL and DDSL
- ensuring safer recruitment practices are followed
- supporting staff to raise concerns
- ensuring safeguarding training is provided and refreshed
- reviewing safeguarding practice and policy regularly
- promoting a culture where safeguarding is prioritised

Leadership must ensure that safeguarding is integrated into organisational decision-making rather than treated as a compliance exercise.

5.10 Safeguarding culture and accountability

Edify Academy is committed to fostering a safeguarding culture characterised by:

- openness and transparency
- clear reporting routes
- respectful challenge
- learning from incidents and near-misses
- continuous improvement

Safeguarding accountability is maintained through:

- regular review of safeguarding records
 - monitoring patterns and themes
 - responding appropriately to concerns about practice
 - ensuring that policies remain up to date
-

5.11 Accountability where concerns involve leadership or the DSL

Where a safeguarding concern involves the DSL, the concern must be reported directly to Edify Academy leadership.

Where concerns involve leadership, staff are encouraged to seek advice from external safeguarding partners or whistleblowing routes in line with this policy.

Safeguarding concerns must never be suppressed or ignored due to seniority or organisational position.

5.12 Safeguarding accountability in a tuition setting

Edify Academy recognises that safeguarding accountability in a tuition setting differs from that in a school.

This policy deliberately avoids school-specific governance structures while ensuring that:

- accountability is clear
- decision-making authority is defined
- safeguarding concerns are escalated appropriately

This approach ensures safeguarding responsibilities are both effective and realistic.

5.13 Consequences of failing to follow safeguarding responsibilities

Failure to comply with safeguarding responsibilities may result in:

- disciplinary action
- termination of contracts
- referral to professional bodies
- referral to statutory authorities

Safeguarding failures are treated seriously and addressed promptly.

5.14 Summary

Clear roles, responsibilities and accountability are essential to effective safeguarding. By defining expectations for all adults, empowering the DSL, and ensuring leadership oversight, Edify Academy aims to ensure that safeguarding concerns are managed consistently, responsibly and in the best interests of children.

****SECTION 6**

PROFESSIONAL CONDUCT, BOUNDARIES AND SAFE WORKING PRACTICE**

6.1 Purpose of this section

Professional conduct and clear boundaries are central to safeguarding, particularly in a tuition setting where adults may work closely with children on a one-to-one basis or in small groups. This section sets out the expectations for safe working practice at Edify Academy and explains how these expectations protect children, staff, and the organisation.

This section functions as an **integrated code of conduct** within the safeguarding framework and applies to all adults working for or on behalf of Edify Academy.

6.2 Principles of professional conduct

All adults working with Edify Academy are expected to act with professionalism, integrity, and respect at all times.

Professional conduct means:

- placing the welfare of children above personal or professional convenience
- maintaining appropriate relationships that are clearly professional in nature
- behaving in a way that could withstand external scrutiny
- understanding that perception matters as well as intent

Staff must consider how their actions could be interpreted by a child, a parent/carer, or an external observer, and must avoid situations that could give rise to misunderstanding, concern, or allegations.

6.3 Maintaining professional boundaries

Boundaries are the limits that define a safe, professional relationship between an adult and a child. Clear boundaries reduce the risk of harm and protect both children and adults.

At Edify Academy, professional boundaries include:

- keeping interactions focused on tuition and educational support
- avoiding emotional dependency or over-reliance
- not sharing personal problems or inappropriate information
- not seeking emotional support from children

Staff must be alert to the possibility that boundary issues can develop gradually and unintentionally, particularly where tuition relationships are long-term.

6.4 One-to-one tuition and safeguarding considerations

Edify Academy recognises that one-to-one tuition presents specific safeguarding considerations.

Safeguarding arrangements for one-to-one work are designed to ensure:

- transparency
- professionalism
- appropriate supervision and oversight

Staff must follow agreed procedures for the delivery of one-to-one tuition, including:

- using appropriate, agreed locations for sessions
- adhering to scheduled session times
- ensuring that sessions take place in environments that minimise risk

Staff must not create private or hidden situations that reduce visibility or accountability.

6.5 Small group tuition

Small group tuition can also present safeguarding risks, including child-on-child abuse or exclusion.

Staff delivering small group sessions are expected to:

- promote respectful behaviour
- remain alert to interactions between children
- intervene appropriately where behaviour raises safeguarding concerns
- report concerns to the DSL

Small group settings do not diminish safeguarding responsibilities.

6.6 Physical contact

Edify Academy staff **avoid physical contact** with children wherever possible.

Any physical contact must be:

- appropriate
- proportionate
- necessary
- consistent with professional judgement

Physical contact must never be used as a means of control, discipline, or punishment.

Edify Academy staff **do not use physical intervention or restraint**. In situations where a child is at immediate risk of serious harm, emergency services will be contacted.

6.7 Intimate and personal care

Edify Academy staff **do not provide intimate or personal care**.

Parents and carers are responsible for ensuring that children attending tuition sessions are able to manage their personal care independently. This clear boundary protects children, staff, and the organisation.

6.8 Transport and off-site activities

Edify Academy does **not** transport children or take children off-site as part of tuition provision.

Parents and carers retain responsibility for arranging travel to and from tuition sessions unless alternative arrangements are explicitly agreed in writing.

Staff must not offer lifts or transport to children under any circumstances unless formally authorised.

6.9 Communication with children

Clear rules governing communication are essential to safeguarding.

All professional communication with children must:

- take place through approved channels
- be related to tuition or safeguarding matters
- be appropriate in tone and content

Staff must not:

- communicate with children through personal social media accounts
- engage in private or informal messaging unrelated to tuition
- share personal contact details unnecessarily

Electronic communication should always be capable of being reviewed if required.

6.10 Use of technology and digital boundaries

Technology can blur boundaries if not managed carefully.

Staff must:

- use organisational accounts and platforms where provided
- maintain professional tone and language
- avoid sharing or viewing inappropriate content
- report any online safeguarding concerns to the DSL

Safeguarding concerns arising from digital communication are treated with the same seriousness as those arising in person.

6.11 Gifts, rewards and incentives

Staff must not give gifts, money, or personal items to children, or offer incentives that could be perceived as favouritism or manipulation.

Any exceptions must be authorised by leadership and handled transparently.

6.12 Favouritism and emotional dependency

Staff must avoid behaviour that could create dependency or perceived favouritism.

Indicators of concern may include:

- excessive personal attention
- prioritising one child over others
- inappropriate emotional closeness

Such situations must be addressed promptly to protect the child and the staff member involved.

6.13 Managing challenging situations

Staff may encounter challenging behaviour or emotionally charged situations.

In such cases, staff must:

- remain calm and professional
- avoid confrontation

- follow safeguarding procedures
- seek guidance from the DSL

Staff must not place themselves or children at unnecessary risk.

6.14 Safeguarding-by-design

Edify Academy adopts a safeguarding-by-design approach, meaning that safeguarding considerations are built into how tuition services are planned and delivered.

This includes:

- thoughtful session planning
- appropriate use of space
- clear supervision arrangements
- transparent communication

Safeguarding is considered proactively rather than reactively.

6.15 Breaches of professional conduct

Any breach of professional conduct or boundaries must be reported to the DSL.

Breaches may be addressed through:

- supervision and guidance
- additional training
- disciplinary or contractual action
- referral to external bodies where appropriate

Low-level concerns are recorded and reviewed to identify patterns and prevent escalation.

6.16 Summary

Clear professional conduct and boundaries are essential to safeguarding in a tuition setting. By establishing and enforcing safe working practices, Edify Academy aims to protect children, support staff, and maintain a safe and professional learning environment.

****SECTION 7**

CONFIDENTIALITY, INFORMATION SHARING AND RECORD-KEEPING**

7.1 Purpose of this section

Safeguarding relies on the timely and appropriate sharing of information. However, information sharing must be balanced with duties of confidentiality and data protection. Confusion in this area is a common cause of safeguarding failures.

This section explains how Edify Academy manages confidentiality, information sharing, and safeguarding records in a way that is **lawful, proportionate, and defensible**, while always prioritising the safety and welfare of children.

7.2 Confidentiality and safeguarding

Confidentiality is an important principle in professional relationships, but it is **not absolute**. In safeguarding contexts, confidentiality must never prevent action that is necessary to protect a child from harm.

Edify Academy makes it clear that:

- safeguarding concerns override normal expectations of confidentiality
- adults must never promise to keep safeguarding information secret
- information may need to be shared without consent where there is a risk of harm

Children should be told, in an age-appropriate way, that information they share may need to be passed on to keep them or others safe.

7.3 Managing expectations of confidentiality with children

Children may disclose sensitive information with the expectation that it will remain private. How adults respond at this stage is critical.

Staff must:

- be honest about the limits of confidentiality
- explain that information will only be shared with people who need to know
- avoid language that could feel threatening or dismissive

This approach helps maintain trust while ensuring safeguarding responsibilities are fulfilled.

7.4 Information sharing principles

Edify Academy follows the government's information sharing principles, which emphasise that:

- the safety and welfare of the child is the primary consideration
- information should be shared proactively where there is a risk of harm
- consent should be sought where appropriate but is not required if seeking consent would place a child at risk
- information shared should be relevant, accurate and proportionate

Decisions about information sharing are based on professional judgement and recorded appropriately.

7.5 Legal basis for sharing safeguarding information

Safeguarding information is processed under the Data Protection Act 2018 and UK GDPR.

Edify Academy recognises that:

- safeguarding information may be shared under lawful bases such as vital interests, public task, or legitimate interests
- special category data may be processed where necessary to protect a child

Data protection legislation **supports** safeguarding and must not be used as a reason to withhold information where a child may be at risk.

7.6 Sharing information without consent

In some circumstances, information may need to be shared without the consent of the child or their parents/carers.

This may be necessary where:

- seeking consent would place the child at further risk
- there is reason to believe a crime has been committed
- a statutory agency requires information to protect the child

Where information is shared without consent, the reasons for doing so must be clearly recorded.

7.7 Who information may be shared with

Safeguarding information may be shared with:

- Children's Social Care

- the police
- the Channel programme (Prevent)
- other safeguarding partners or professionals involved in the child's care

Information is shared on a **need-to-know basis only** and only where relevant to safeguarding.

7.8 Internal information sharing

Within Edify Academy, safeguarding information is shared only with individuals who need it to carry out safeguarding responsibilities.

This typically includes:

- the Designated Safeguarding Lead
- the Deputy DSL
- leadership, where appropriate

Staff must not discuss safeguarding concerns informally or outside appropriate professional contexts.

7.9 Record-keeping as a safeguarding tool

Accurate and timely record-keeping is a critical component of effective safeguarding. Records support continuity, accountability, and defensible decision-making.

Edify Academy requires that all safeguarding concerns are recorded, regardless of perceived seriousness.

Records help to:

- identify patterns and cumulative harm
 - support decision-making
 - evidence actions taken
 - facilitate appropriate information sharing
-

7.10 What should be recorded

Safeguarding records should include:

- the nature of the concern
- how the concern arose
- the date, time and context
- the child's words where a disclosure is made
- actions taken and decisions made
- the rationale for decisions, including why referrals were or were not made

Records must distinguish clearly between **fact**, **observation**, and **professional judgement**.

7.11 How records should be written

Safeguarding records must be:

- factual and objective
- clear and concise
- free from speculation or emotive language
- written as soon as possible after the concern arises

Records should be written with the understanding that they may be reviewed by external agencies, inspectors, or courts.

7.12 Storage and security of safeguarding records

Safeguarding records are stored securely, with access restricted to authorised safeguarding personnel.

Edify Academy ensures that:

- records are protected against unauthorised access
- digital records are password-protected and encrypted where appropriate
- paper records, where used, are stored securely

Safeguarding records are kept separately from general administrative records.

7.13 Retention and disposal of records

Safeguarding records are retained in accordance with data protection requirements and safeguarding guidance.

Records are retained for as long as necessary to protect the child, support accountability, and meet legal obligations.

When records are disposed of, this is done securely and appropriately.

7.14 Recording decisions not to refer

It is essential to record not only actions taken, but also decisions **not** to take certain actions.

Where a decision is made not to refer a concern to Children's Social Care or another agency, the rationale must be clearly recorded, including:

- why the threshold was not met at that time
- what alternative actions were taken
- how the situation will be monitored

This ensures transparency and defensibility.

7.15 Access to records and subject access requests

Children and parents/carers may have the right to request access to records under data protection legislation.

Safeguarding records may be exempt from disclosure where releasing information would:

- place a child or another person at risk
- prejudice an ongoing safeguarding investigation

All such requests must be managed carefully and, where appropriate, with legal advice.

7.16 Learning from records and incidents

Safeguarding records are not simply administrative documents. They provide valuable insight into safeguarding practice.

Edify Academy uses safeguarding records to:

- identify trends or recurring issues
- review the effectiveness of responses
- inform training and policy review

Learning from safeguarding incidents is essential to continuous improvement.

7.17 Summary

Effective safeguarding depends on the careful balance of confidentiality, information sharing, and robust record-keeping. By managing information lawfully, proportionately, and transparently, Edify Academy ensures that safeguarding decisions are child-centred, accountable, and defensible.

****SECTION 8**

RECOGNISING SAFEGUARDING CONCERNS AND RESPONDING TO DISCLOSURES**

8.1 Purpose of this section

Recognising safeguarding concerns and responding appropriately when a child shares information is among the most critical safeguarding responsibilities. In a tuition setting, staff may build trusted relationships with children over time, which can place them in a unique position to notice concerns or receive disclosures.

This section sets out how Edify Academy expects staff to identify safeguarding concerns, respond to disclosures, and escalate issues in a timely, child-centred, and legally defensible way.

8.2 Recognising safeguarding concerns

Safeguarding concerns may arise in many ways and are not always obvious. Abuse, neglect, and exploitation often occur behind closed doors and may be deliberately concealed.

Staff must remain alert to a wide range of possible indicators, including:

- changes in behaviour, mood, or engagement
- withdrawal, anxiety, or heightened emotional responses
- unexplained injuries or changes in appearance
- persistent tiredness, hunger, or lack of appropriate clothing
- concerning comments, jokes, or references
- changes in attendance or engagement with tuition
- disclosures or partial disclosures

No single indicator confirms abuse. Safeguarding concerns often emerge through **patterns, accumulation of information**, or changes over time.

8.3 Professional curiosity

Edify Academy promotes professional curiosity as a core safeguarding skill. Professional curiosity involves being open-minded, asking appropriate questions, and considering whether there may be underlying reasons for a child's presentation or behaviour.

Staff should reflect on questions such as:

- "What might be happening for this child?"
- "Is this behaviour unusual or escalating?"
- "Could this be linked to wider safeguarding concerns?"

Professional curiosity must always be exercised respectfully and without interrogation or assumption.

8.4 Disclosures of abuse or harm

Children may disclose safeguarding concerns directly, indirectly, or in fragments over time. A disclosure may occur spontaneously, during a tuition session, or in response to a question unrelated to safeguarding.

Disclosures may relate to:

- abuse at home
- abuse by peers
- online harm or exploitation
- self-harm or suicidal thoughts
- fear of a particular person or situation

Staff must treat all disclosures seriously, regardless of how or when they occur.

8.5 Responding to a disclosure – immediate principles

When a child discloses safeguarding information, the adult's response is crucial.

Staff must:

- listen carefully and calmly
- allow the child to speak freely

- take the disclosure seriously
- reassure the child that they have done the right thing by telling someone

Staff must not:

- express shock, disbelief, or judgement
- ask leading or investigative questions
- promise confidentiality
- make assumptions about what happened

The aim is to create a safe space where the child feels heard, without compromising safeguarding procedures.

8.6 Explaining next steps to the child

Children should be told, in an age-appropriate way, what will happen next.

Staff should explain that:

- the information will be shared with people who need to know to keep them safe
- the child is not in trouble
- support will be considered

Clear and honest communication helps reduce anxiety and maintains trust.

8.7 Recording disclosures and concerns

All safeguarding disclosures and concerns must be recorded as soon as possible.

Records must:

- use the child's own words where possible
- distinguish clearly between fact and interpretation
- include the date, time, and context
- record the name of the person reporting and receiving the information

Staff should not delay reporting in order to write a "perfect" record. Recording and reporting should happen promptly.

8.8 Reporting concerns internally

All safeguarding concerns must be reported immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL.

Staff must not:

- attempt to resolve safeguarding concerns themselves
- investigate or gather evidence
- discuss concerns informally with colleagues

If the DSL is unavailable and there is concern about delay increasing risk, staff must seek advice from Children's Social Care or emergency services, then inform the DSL as soon as possible.

8.9 Immediate risk and emergency situations

If a child is at immediate risk of serious harm:

1. Emergency services must be contacted immediately (999).
2. A referral to Children's Social Care must be made.
3. The DSL must be informed as soon as possible.

Any adult may make a referral if delay would place a child at further risk.

8.10 Early help and lower-level concerns

Not all safeguarding concerns meet the threshold for immediate referral to statutory agencies. However, lower-level concerns may still indicate vulnerability or risk.

Where concerns do not meet statutory thresholds, the DSL may consider:

- monitoring and review
- discussion with parents or carers (where safe and appropriate)
- signposting or early help referrals

Early action can prevent escalation and reduce harm.

8.11 Thresholds and decision-making

Determining safeguarding thresholds is the responsibility of the DSL.

In making decisions, the DSL will consider:

- the nature and severity of the concern
- the child's age and vulnerability
- patterns or cumulative concerns
- advice from local safeguarding partners

Decisions are based on professional judgement and are recorded clearly.

8.12 Allegations involving adults

Where a concern involves an adult working with Edify Academy, including inappropriate behaviour or potential harm to a child, this must be reported immediately to the DSL and leadership.

The DSL or leadership will contact the Local Authority Designated Officer (LADO) where the allegation meets the threshold.

Staff must not investigate allegations themselves.

8.13 Child-on-child abuse

Edify Academy recognises that children can abuse other children. Such behaviour is not dismissed as “banter” or “normal behaviour”.

Child-on-child abuse may include:

- bullying or harassment
- sexual harassment or violence
- coercive behaviour
- online abuse

Concerns must be reported and managed through safeguarding procedures, with careful consideration of risk to all children involved.

8.14 Sharing nudes or semi-nudes

Incidents involving the sharing of nude or semi-nude images are treated as safeguarding concerns.

Staff must:

- report immediately to the DSL

- not view, copy, store, forward, or delete images
- not ask children to show or resend images

The DSL will follow national guidance to determine appropriate action and referrals.

8.15 Safeguarding concerns involving mental health

Where disclosures involve self-harm, suicidal thoughts, or significant mental health distress, staff must treat this as a safeguarding concern and report it immediately.

The DSL will determine appropriate action, including emergency support where required.

8.16 Supporting staff following disclosures

Receiving safeguarding disclosures can be emotionally challenging.

Edify Academy recognises the importance of supporting staff and will provide guidance, supervision, and signposting where needed.

Confidentiality regarding safeguarding concerns must still be maintained.

8.17 Summary

Recognising safeguarding concerns and responding appropriately requires vigilance, professionalism, and clarity of action. By following these procedures, Edify Academy aims to ensure that children are listened to, protected, and supported, and that safeguarding decisions are timely and defensible.

****SECTION 9**

WORKING WITH PARENTS AND CARERS**

9.1 Purpose of this section

Parents and carers play a central role in safeguarding children. In most cases, working openly and constructively with parents and carers supports better outcomes for children. However, safeguarding situations are not always straightforward, and there are circumstances where sharing information with parents or carers may place a child at increased risk.

This section explains how Edify Academy works with parents and carers in a way that is **child-centred, legally sound, and proportionate**, while recognising the specific role and limits of a tuition provider.

9.2 The importance of partnership with parents and carers

Edify Academy recognises that parents and carers are usually the primary source of support, protection, and advocacy for their children. Wherever possible and appropriate, safeguarding practice is based on partnership, transparency, and mutual respect.

Effective partnership with parents and carers can:

- support early identification of concerns
- provide context and understanding of a child's circumstances
- help secure appropriate support for the child
- reduce misunderstandings or conflict

Staff are expected to communicate professionally and respectfully with parents and carers and to avoid assumptions or judgement.

9.3 Parents, carers and safeguarding responsibilities

While parents and carers hold primary responsibility for a child's welfare outside tuition provision, Edify Academy retains safeguarding responsibilities during the delivery of its services.

Parents and carers are expected to:

- provide accurate and relevant information where appropriate
- support safeguarding arrangements
- respect professional boundaries

Edify Academy does not assume parental authority or decision-making responsibility, but it does have a duty to act where safeguarding concerns arise.

9.4 Informing parents and carers about safeguarding concerns

As a general principle, parents and carers will normally be informed when safeguarding concerns arise involving their child.

However, the decision to inform parents or carers is **not automatic** and must be based on the child's safety and best interests.

The Designated Safeguarding Lead (DSL) is responsible for deciding:

- whether parents or carers should be informed
- when information should be shared
- what information should be shared

Staff must not inform parents or carers of safeguarding concerns without consulting the DSL.

9.5 Situations where parents or carers may not be informed

There are circumstances where informing parents or carers may place a child at increased risk or compromise a safeguarding investigation.

This may include situations where:

- there is a concern that a parent or carer may be involved in the abuse
- informing parents could lead to intimidation, retaliation, or harm
- a child expresses a credible fear about parental response
- statutory agencies advise against parental notification

In such cases, the DSL will follow the advice of Children's Social Care or the police and will record the rationale for decisions made.

9.6 Managing parental disagreement or challenge

Safeguarding decisions may sometimes lead to disagreement or challenge from parents or carers, particularly where they do not agree that a concern is justified or where action is taken without their consent.

Edify Academy recognises that disagreement does not remove safeguarding responsibility.

In these situations:

- staff must remain calm, professional, and respectful
- safeguarding decisions must remain child-centred
- concerns must not be withdrawn or altered due to pressure

Where necessary, the DSL will seek advice from safeguarding partners or leadership to manage conflict appropriately.

9.7 Consent and safeguarding

Consent is an important consideration in safeguarding, but it is not required where seeking consent would place a child at risk.

The DSL will consider:

- whether consent is appropriate and safe to seek
- the child's wishes and feelings
- the potential impact of seeking or not seeking consent

Staff must understand that safeguarding action may be taken without parental consent where necessary to protect a child.

9.8 Confidentiality and information sharing with parents

Information shared with parents or carers must be:

- relevant
- proportionate
- appropriate to the safeguarding concern

Safeguarding information should not be shared in a way that:

- compromises the child's safety
- prejudices an investigation
- breaches confidentiality unnecessarily

The DSL will determine what information can be shared and how.

9.9 Supporting parents and carers

Safeguarding concerns can be distressing for parents and carers. Where appropriate, Edify Academy aims to communicate with empathy and clarity, recognising the emotional impact of safeguarding discussions.

Where Edify Academy is unable to provide direct support, parents and carers may be signposted to appropriate services or agencies.

9.10 Tuition-specific considerations

As a tuition provider, Edify Academy recognises that:

- parents and carers may not be present during sessions
- communication may occur outside session times
- staff may receive information indirectly via parents

Safeguarding concerns arising from information shared by parents must be treated with the same seriousness as concerns arising from other sources.

Staff must record and report such information promptly.

9.11 Complaints involving safeguarding

Where a complaint from a parent or carer raises safeguarding concerns, it will be managed in accordance with safeguarding procedures rather than solely through complaints processes.

Safeguarding considerations take precedence over complaints handling.

9.12 Managing boundaries with parents and carers

Staff must maintain professional boundaries with parents and carers, avoiding informal or personal relationships that could compromise safeguarding or professional judgement.

Communication must remain professional, transparent, and focused on the child's educational and safeguarding needs.

9.13 Summary

Working effectively with parents and carers is a vital part of safeguarding, but it must always be guided by the child's best interests. By applying clear decision-making, professional judgement, and appropriate boundaries, Edify Academy aims to ensure that safeguarding practice remains robust, respectful, and defensible.

****SECTION 10**

CHILDREN WITH ADDITIONAL NEEDS, INCLUDING SEND, MENTAL HEALTH NEEDS, LOOKED-AFTER STATUS AND SOCIAL WORKER INVOLVEMENT**

10.1 Purpose of this section

Some children face increased safeguarding risks due to their personal circumstances, experiences, or additional needs. This section explains how Edify Academy recognises and

responds to safeguarding considerations for children who may require additional awareness, sensitivity, or adjustment in safeguarding practice.

The purpose of this section is not to categorise or label children, but to ensure that safeguarding arrangements are **responsive, inclusive, and proportionate**, and that potential risks are not overlooked due to assumptions or lack of understanding.

10.2 Safeguarding and additional needs

Children with additional needs are not inherently more vulnerable because of who they are. Increased risk often arises from external factors such as dependency on adults, communication barriers, isolation, or previous experiences of harm.

In a tuition setting, staff may work closely with children who have additional needs in a focused environment, making it especially important to remain alert to safeguarding indicators and to reflect carefully on what behaviour or presentation may be communicating.

Safeguarding decisions must always be based on the child's individual circumstances rather than generic assumptions.

10.3 Children with special educational needs and disabilities (SEND)

Children with SEND may experience additional safeguarding risks and barriers to disclosure. These risks can include:

- difficulty recognising or articulating abuse
- reliance on adults for support
- reduced access to peer networks
- behaviour that may mask distress or harm

Edify Academy expects staff to approach safeguarding involving children with SEND with heightened awareness and sensitivity.

Staff must:

- avoid attributing concerning behaviour solely to a child's needs
- consider whether behaviour or distress could indicate safeguarding concerns
- adapt communication where necessary
- seek advice from the DSL when concerns arise

Safeguarding concerns involving children with SEND must be taken as seriously as those involving any other child.

10.4 Communication differences and safeguarding

Some children may communicate distress in non-verbal ways or through changes in behaviour rather than direct disclosure.

In a tuition context, staff may notice:

- increased withdrawal or disengagement
- frustration or emotional outbursts
- changes in concentration or motivation

Such changes must not be dismissed or normalised without reflection. Staff should consider whether safeguarding concerns may be contributing and should report concerns to the DSL where appropriate.

10.5 Mental health needs and safeguarding

Mental health difficulties can be both a safeguarding concern in their own right and an indicator of underlying harm.

Edify Academy recognises that children experiencing mental health challenges may be more vulnerable to:

- exploitation
- self-harm
- abuse
- coercion or manipulation

Staff must treat significant mental health concerns as safeguarding issues where there is risk of harm to the child or others.

Edify Academy does not provide therapeutic services; however, it recognises its responsibility to act when mental health concerns raise safeguarding risks.

10.6 Self-harm and suicidal ideation

Self-harm and suicidal thoughts require immediate safeguarding attention.

Where staff become aware of:

- self-harm behaviours
- expressions of suicidal thoughts
- significant emotional distress

They must report this immediately to the DSL.

The DSL will determine appropriate action, which may include emergency services, referral to Children's Social Care, or other statutory support.

Such concerns must never be managed in isolation or minimised.

10.7 Looked-after and previously looked-after children

Looked-after and previously looked-after children may have experienced trauma, instability, or disrupted attachments. These experiences can have lasting impacts on trust, emotional regulation, and vulnerability to harm.

Where Edify Academy is aware that a child is looked-after or previously looked-after, this information will inform safeguarding decision-making.

Safeguarding practice must:

- be sensitive to past experiences
- recognise potential triggers
- avoid unnecessary disruption or re-traumatisation

The DSL will consider whether additional information sharing or liaison with professionals is appropriate.

10.8 Children with a social worker

The presence of a social worker indicates that a child may be subject to child protection, child in need, or other statutory arrangements.

Where Edify Academy is aware that a child has a social worker, safeguarding practice must reflect this context.

This may include:

- increased vigilance regarding concerns
- careful consideration of cumulative harm

- appropriate information sharing with statutory agencies

Edify Academy will cooperate with statutory agencies while maintaining clear boundaries regarding its role and responsibilities as a tuition provider.

10.9 Confidentiality and additional needs

Children with additional needs may require additional reassurance around confidentiality and information sharing.

Staff must:

- explain safeguarding processes clearly and accessibly
- avoid making promises that cannot be kept
- ensure the child understands that information is shared to keep them safe

Safeguarding practice must balance respect for the child's autonomy with the need to protect them from harm.

10.10 Attendance, engagement and safeguarding context

Edify Academy does not hold statutory responsibility for attendance monitoring. However, changes in attendance or engagement may indicate safeguarding concerns, particularly for children with additional needs.

Unexplained disengagement or withdrawal from tuition may prompt safeguarding consideration and discussion with the DSL.

10.11 Avoiding assumptions and diagnostic bias

Safeguarding decisions must not be influenced by assumptions about a child's diagnosis, behaviour, or family circumstances.

Staff must remain open-minded and reflective, recognising that safeguarding concerns may present differently for different children.

The DSL will provide guidance where uncertainty exists.

10.12 Supporting staff working with children with additional needs

Working with children who have additional needs or complex circumstances can be challenging.

Edify Academy recognises the importance of supporting staff through:

- access to safeguarding advice
- opportunities to discuss concerns
- guidance on managing emotional impact

Staff must not carry safeguarding concerns alone.

10.13 Summary

Children with additional needs may face increased safeguarding risks and barriers to disclosure. By recognising these risks, adapting safeguarding practice, and remaining vigilant, Edify Academy aims to ensure that all children are protected appropriately and equitably.

****SECTION 11**

ALLEGATIONS AGAINST ADULTS, LOW-LEVEL CONCERNS AND WHISTLEBLOWING**

11.1 Purpose of this section

Safeguarding concerns relating to the behaviour or conduct of adults working with children require particularly careful handling. Failure to respond appropriately to such concerns can place children at risk and expose the organisation to significant legal, regulatory, and reputational consequences.

This section sets out how Edify Academy manages:

- allegations against adults working with children
- concerns that fall below the threshold of an allegation (“low-level concerns”)
- whistleblowing and safeguarding escalation

The approach is designed to protect children, ensure fairness to adults, and support a culture of transparency and accountability.

11.2 Scope of this section

This section applies to concerns about the conduct or behaviour of:

- employees
- tutors
- contractors

- volunteers
- any adult working on behalf of Edify Academy

Concerns may arise from direct observation, disclosure, third-party information, or external agencies.

11.3 What constitutes an allegation against an adult

An allegation is where there is information that an adult has:

- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child in a way that indicates they may pose a risk of harm

Allegations may relate to behaviour inside or outside the tuition setting.

An allegation does **not** require proof or certainty. The threshold is whether the information suggests potential risk.

11.4 Immediate action where an allegation is made

Any allegation against an adult working with Edify Academy must be reported **immediately** to the Designated Safeguarding Lead (DSL) and leadership.

Staff must not:

- investigate the allegation
- question the adult involved
- attempt to resolve the matter informally
- discuss the allegation with others

Immediate action is required to ensure that children are protected and that appropriate advice is sought.

11.5 Role of the Local Authority Designated Officer (LADO)

Where an allegation meets the threshold outlined above, Edify Academy will contact the **Local Authority Designated Officer (LADO)** without delay.

The LADO provides advice and oversight in cases involving allegations against adults working with children.

Edify Academy will:

- follow LADO advice regarding next steps
- not commence an internal investigation until advised
- cooperate fully with any external processes

The role of the LADO is to ensure that cases are managed consistently and fairly, and that children's welfare remains paramount.

11.6 Suspension and safeguarding measures

Decisions regarding suspension or removal from duties are made on a case-by-case basis and are informed by LADO advice where applicable.

Suspension is a neutral act and does not imply guilt. In some cases, alternative safeguarding measures may be appropriate.

The primary consideration is the safety and welfare of children.

11.7 Confidentiality and information sharing in allegations

Information relating to allegations against adults must be handled sensitively and confidentially.

Information will only be shared with:

- individuals who need to know to protect children
- statutory agencies as required
- advisers providing safeguarding or legal guidance

Edify Academy recognises the importance of protecting both children and adults from unnecessary harm arising from misinformation or speculation.

11.8 Low-level concerns – definition and purpose

Low-level concerns are concerns about adult behaviour that does not meet the threshold of an allegation but may indicate inappropriate conduct, boundary issues, or emerging risk.

Examples may include:

- overly familiar behaviour
- inconsistent professional boundaries

- inappropriate language or tone
- poor judgement in communication

Low-level concerns are important because patterns of behaviour may escalate if not addressed.

11.9 Managing low-level concerns

Low-level concerns must be reported to the DSL or leadership.

They will be:

- recorded appropriately
- reviewed objectively
- addressed proportionately

Responses may include:

- advice and guidance
- supervision or training
- clarification of expectations

Low-level concerns are not ignored or dismissed, but they are handled fairly and proportionately.

11.10 Recording and reviewing concerns about adults

All allegations and low-level concerns are recorded securely and confidentially.

Records include:

- the nature of the concern
- actions taken
- advice received
- outcomes or next steps

Records are reviewed to identify patterns, themes, or repeated concerns that may indicate risk.

11.11 Whistleblowing and safeguarding escalation

Edify Academy encourages a culture where staff feel able to raise safeguarding concerns without fear of reprisal.

Whistleblowing refers to raising concerns where:

- internal reporting routes have not been effective
- the concern involves leadership
- the concern is being suppressed or ignored

Staff are encouraged to raise concerns internally first, but external routes may be used where appropriate.

11.12 Protection for whistleblowers

Staff who raise safeguarding concerns in good faith will be supported.

Edify Academy does not tolerate victimisation or retaliation against individuals who raise concerns about safeguarding practice.

Concerns about retaliation must be reported and addressed promptly.

11.13 Allegations involving leadership or the DSL

Where a safeguarding concern involves the DSL, it must be reported directly to leadership.

Where a concern involves leadership, staff may seek advice from external safeguarding partners, the LADO, or whistleblowing routes.

Safeguarding concerns must never be dismissed due to seniority or organisational position.

11.14 False or malicious allegations

Edify Academy recognises that false or malicious allegations may occur, although they are rare.

Where an allegation is found to be deliberately false or malicious, appropriate action may be taken. However, the possibility of false allegations must never deter staff from reporting genuine concerns.

11.15 Learning from allegations and concerns

Safeguarding practice is strengthened by learning from concerns and incidents.

Edify Academy uses information from allegations and low-level concerns to:

- review policies and procedures
- improve training
- strengthen safeguarding culture

Learning is used to prevent recurrence and improve practice.

11.16 Summary

Managing concerns about adults requires clarity, fairness, and a strong safeguarding culture. By responding promptly to allegations, addressing low-level concerns, and supporting whistleblowing, Edify Academy aims to protect children, support staff, and maintain trust and accountability.

****SECTION 12**

SAFER RECRUITMENT, VETTING AND INDUCTION**

12.1 Purpose of this section

Safer recruitment is a critical component of safeguarding. While recruitment processes alone cannot prevent harm, robust vetting and induction procedures reduce the likelihood that unsuitable individuals gain access to children and ensure that safeguarding expectations are clear from the outset.

This section explains how Edify Academy approaches safer recruitment in a way that is **lawful, proportionate, and appropriate to a tuition provider**, while maintaining strong safeguarding standards.

12.2 Safer recruitment in a tuition context

Edify Academy is not a school and does not operate a statutory staffing structure. However, it recognises that tuition provision often involves close, direct contact with children, including one-to-one work, which can increase safeguarding risk if not managed appropriately.

Safer recruitment at Edify Academy therefore focuses on:

- preventing unsuitable individuals from working with children
- ensuring individuals understand safeguarding responsibilities

- embedding safeguarding expectations from the point of engagement

Recruitment decisions are informed by safeguarding considerations at every stage.

12.3 Roles and regulated activity

Not all roles within Edify Academy constitute regulated activity. However, many tuition roles may involve regular, unsupervised contact with children.

Edify Academy assesses each role individually to determine:

- the nature of contact with children
- whether the role constitutes regulated activity
- the level of vetting required

This role-specific assessment ensures compliance with safeguarding legislation while avoiding unnecessary or unlawful checks.

12.4 Pre-appointment checks

Prior to engagement, Edify Academy undertakes appropriate pre-appointment checks, which may include:

- verification of identity
- right-to-work checks
- relevant qualifications or experience
- references that specifically address suitability to work with children
- Disclosure and Barring Service (DBS) checks where appropriate

No individual will be permitted to work unsupervised with children until the necessary checks have been completed or appropriate safeguarding measures are in place.

12.5 Disclosure and Barring Service (DBS) checks

DBS checks are an important safeguarding measure but are not a guarantee of suitability.

Edify Academy ensures that:

- DBS checks are undertaken where roles meet the criteria
- the level of check is appropriate to the role

- information disclosed is assessed carefully and fairly

A criminal record does not automatically prevent engagement. Decisions are made on a case-by-case basis, taking into account the nature of the offence, relevance to the role, and safeguarding risk.

12.6 References and employment history

References play an important role in safer recruitment.

Edify Academy seeks references that:

- comment on the individual's suitability to work with children
- cover relevant employment or experience
- raise any safeguarding concerns

Gaps in employment history are explored sensitively and appropriately.

12.7 Recruitment decisions and safeguarding judgement

Recruitment decisions are informed by professional judgement rather than reliance on a single check or document.

Edify Academy recognises that safeguarding risk is reduced most effectively through a **combination** of:

- vetting
 - supervision
 - clear conduct expectations
 - safeguarding training
 - organisational culture
-

12.8 Induction and safeguarding expectations

All adults working with Edify Academy receive safeguarding information as part of their induction.

Induction includes:

- introduction to this safeguarding policy

- explanation of reporting procedures
- clarification of professional boundaries
- expectations regarding conduct and communication
- information on who to contact with concerns

Safeguarding expectations are made explicit from the outset.

12.9 Ongoing supervision and safeguarding assurance

Safer recruitment does not end at appointment.

Edify Academy maintains safeguarding assurance through:

- ongoing supervision or oversight
- regular safeguarding updates
- monitoring of conduct and practice
- encouragement of reflective practice

Concerns arising after appointment are addressed promptly and proportionately.

12.10 Use of contractors and third parties

Where Edify Academy engages contractors or third parties who may come into contact with children, safeguarding expectations are made clear.

This includes:

- confirmation of appropriate vetting
- agreement to follow safeguarding policies
- clarity about reporting routes

Safeguarding responsibility cannot be delegated.

12.11 Single central record and documentation

Edify Academy maintains appropriate records of recruitment checks and safeguarding documentation in line with data protection requirements.

Records are:

- accurate

- securely stored
- accessible to authorised personnel only

Documentation supports accountability and transparency.

12.12 Managing concerns identified during recruitment

Where safeguarding concerns arise during recruitment, Edify Academy will:

- pause recruitment processes
- seek appropriate advice
- make decisions that prioritise child safety

Concerns identified at this stage are treated seriously and handled with care.

12.13 Safer recruitment and equality

Safer recruitment processes are applied fairly and without discrimination.

Edify Academy recognises the importance of balancing safeguarding with equality, privacy, and rehabilitation considerations.

12.14 Summary

Safer recruitment is a foundational safeguarding measure. By applying proportionate vetting, clear induction, and ongoing supervision, Edify Academy aims to reduce risk, support safe practice, and ensure that all adults working with children understand and fulfil their safeguarding responsibilities.

****SECTION 13**

SAFEGUARDING TRAINING, AWARENESS AND STAFF DEVELOPMENT**

13.1 Purpose of this section

Safeguarding policies and procedures are only effective when those responsible for implementing them understand their role and feel confident in applying safeguarding principles in practice. Training and awareness are therefore central to Edify Academy's safeguarding framework.

This section explains how Edify Academy ensures that all adults working with children have the **knowledge, awareness, and confidence** required to identify safeguarding concerns, respond appropriately, and fulfil their responsibilities in line with this policy.

13.2 Safeguarding competence and professional responsibility

Safeguarding competence involves more than awareness of procedures. It requires understanding, judgement, and the ability to apply safeguarding principles to real situations.

Edify Academy recognises that safeguarding competence develops over time and through:

- training and updates
- reflective practice
- supervision and guidance
- experience working with children

Staff are expected to take responsibility for maintaining their safeguarding knowledge and to seek advice where uncertainty exists.

13.3 Induction safeguarding training

All adults working with Edify Academy receive safeguarding information as part of their induction.

Induction safeguarding training includes:

- an overview of safeguarding and child protection
- explanation of this safeguarding policy
- guidance on recognising signs of abuse, neglect and exploitation
- instruction on responding to disclosures
- reporting procedures and escalation routes
- professional boundaries and conduct expectations
- confidentiality and information sharing principles

Induction ensures that safeguarding expectations are clear before any direct work with children begins.

13.4 Ongoing safeguarding training and updates

Safeguarding is a dynamic area of practice, and risks evolve over time. Edify Academy ensures that safeguarding training is refreshed regularly to reflect changes in legislation, guidance, and emerging risks.

Ongoing safeguarding training may include:

- periodic safeguarding updates
- briefings on specific safeguarding themes
- updates on local safeguarding arrangements
- learning from incidents or near-misses

Training is proportionate to role and responsibilities and is designed to reinforce safeguarding awareness rather than overwhelm staff with information.

13.5 Designated Safeguarding Lead (DSL) training

The Designated Safeguarding Lead (DSL) undertakes enhanced safeguarding training appropriate to the role.

This includes:

- training on child protection processes and thresholds
- inter-agency working and referrals
- managing allegations against adults
- information sharing and record-keeping
- Prevent and extremism awareness

The DSL receives regular updates to ensure knowledge remains current and practice remains effective.

13.6 Deputy Designated Safeguarding Lead (DDSL) training

The Deputy DSL receives training commensurate with their responsibilities to ensure continuity of safeguarding leadership when required.

The DDSL must be confident in:

- receiving and responding to safeguarding concerns
- making referrals where necessary
- advising staff appropriately

13.7 Prevent awareness and safeguarding

Edify Academy recognises its responsibility to be alert to the risk of radicalisation and extremism.

Safeguarding training includes Prevent awareness to ensure that staff:

- understand the signs of radicalisation
- know how to report concerns
- recognise Prevent as a safeguarding issue

Prevent training is proportionate and contextualised to the tuition setting.

13.8 Online safety awareness

Safeguarding training includes awareness of online risks, even where tuition is delivered in person.

Staff receive guidance on:

- online abuse and exploitation
- grooming and coercion
- digital boundaries and professional conduct
- responding to online safeguarding disclosures

Online safeguarding awareness reflects the realities of children's digital lives.

13.9 Training records and monitoring

Edify Academy maintains records of safeguarding training and updates completed by staff.

These records support:

- accountability
- assurance
- identification of training needs

Training records are reviewed to ensure compliance and to inform future planning.

13.10 Supporting staff confidence and wellbeing

Safeguarding responsibilities can be emotionally demanding. Edify Academy recognises the importance of supporting staff confidence and wellbeing.

Support may include:

- access to safeguarding advice
- opportunities to discuss concerns
- reassurance and guidance following incidents

Staff must not feel isolated or unsupported when dealing with safeguarding matters.

13.11 Learning from safeguarding practice

Safeguarding training is informed by learning from practice.

This includes:

- reflection on safeguarding incidents
- review of decision-making
- incorporation of lessons learned into training and guidance

Learning from practice supports continuous improvement.

13.12 Safeguarding culture and leadership role

Leadership plays a key role in modelling the importance of safeguarding and promoting a culture where training and awareness are valued.

Edify Academy leadership ensures that safeguarding training is prioritised and supported.

13.13 Summary

Safeguarding training and awareness are essential to effective safeguarding practice. By providing proportionate training, ongoing updates, and supportive guidance, Edify Academy ensures that safeguarding responsibilities are understood, applied confidently, and embedded into everyday practice.

****SECTION 14**

ONLINE SAFETY, DIGITAL SAFEGUARDING AND USE OF TECHNOLOGY**

14.1 Purpose of this section

Children's lives are increasingly shaped by digital technology. Even where tuition is delivered in person, online environments play a significant role in children's social, emotional, and educational experiences. Safeguarding therefore requires awareness of online risks and clear professional boundaries in digital communication.

This section explains how Edify Academy approaches online safety and digital safeguarding in a way that is **proportionate, realistic, and effective**, without assuming parental or statutory monitoring responsibilities that fall outside the role of a tuition provider.

14.2 Online safeguarding as a safeguarding issue

Online harm is treated as a safeguarding issue in the same way as offline harm. Abuse, exploitation, coercion, bullying, and radicalisation may all occur through digital platforms and may have serious real-world consequences for children.

Edify Academy recognises that:

- online abuse may occur outside tuition sessions but still affect a child's wellbeing
- children may disclose online harm during tuition sessions
- online activity may increase vulnerability to other forms of harm

Safeguarding responses do not differ based on whether harm occurs online or offline.

14.3 Scope and limits of responsibility

Edify Academy does not monitor children's personal devices, social media accounts, or online activity. Parents and carers retain primary responsibility for supervising children's online activity outside tuition sessions.

However, where online safeguarding concerns are disclosed or observed during the course of tuition provision, Edify Academy has a responsibility to respond in line with safeguarding procedures.

This includes:

- listening to disclosures
- recording concerns
- reporting concerns to the DSL
- making referrals where appropriate

14.4 Professional digital boundaries

Clear digital boundaries are essential to safeguarding in a tuition setting.

All professional communication with children must:

- take place through approved channels
- be directly related to tuition or safeguarding matters
- be professional in tone and content

Staff must not:

- communicate with children via personal social media accounts
- engage in private or informal messaging unrelated to tuition
- share personal contact details unnecessarily
- engage in online interactions that blur professional boundaries

Digital communication should always be capable of being reviewed if required.

14.5 Use of technology in tuition delivery

Where technology is used to support tuition delivery, safeguarding considerations must be taken into account.

Staff must ensure that:

- technology use is appropriate to the child's age and needs
- online platforms are used professionally
- safeguarding expectations are maintained consistently

Any concerns arising from the use of technology during tuition sessions must be reported to the DSL.

14.6 Online bullying and harassment

Online bullying and harassment can have a significant impact on children's mental health and wellbeing.

Staff may become aware of online bullying through:

- disclosures from children

- changes in behaviour or engagement
- indirect comments or references

Such concerns must be treated seriously and managed through safeguarding procedures, even where the behaviour occurs outside tuition sessions.

14.7 Online sexual abuse and exploitation

Online sexual abuse and exploitation may involve grooming, coercion, sharing of images, or manipulation through digital platforms.

Children may not recognise such experiences as abuse and may feel shame or fear about disclosure.

Staff must:

- respond calmly and supportively to disclosures
- avoid judgement or blame
- report concerns immediately to the DSL

Staff must never attempt to investigate or gather evidence.

14.8 Sharing nudes or semi-nudes

The sharing of nude or semi-nude images is a safeguarding concern.

Edify Academy follows national guidance on responding to incidents involving nude or semi-nude images.

Staff must:

- report incidents immediately to the DSL
- not view, copy, store, forward, or delete images
- not ask children to send or show images

The DSL will determine appropriate action, including referral to statutory agencies where required.

14.9 Online radicalisation and extremism

Children may encounter extremist content or be targeted for radicalisation online.

Edify Academy recognises online radicalisation as a safeguarding risk.

Staff must be alert to:

- changes in language or beliefs
- fixation on extremist content
- expressions of hatred or intolerance

Concerns must be reported to the DSL and managed in line with Prevent safeguarding procedures.

14.10 Artificial intelligence (AI) and emerging technologies

Emerging technologies, including artificial intelligence, present both opportunities and risks for children.

Potential safeguarding risks associated with AI may include:

- exposure to inappropriate or harmful content
- misinformation or manipulation
- inappropriate reliance on AI for emotional support
- exploitation through AI-enabled platforms

Edify Academy recognises that safeguarding practice must adapt to emerging technologies and will respond to concerns involving AI through existing safeguarding procedures.

14.11 Safeguarding disclosures involving online harm

Children may disclose online harm gradually or indirectly.

Staff must:

- listen carefully
- take concerns seriously
- avoid minimising harm due to its online nature
- report concerns promptly

Online harm can be as damaging as offline harm and must be treated accordingly.

14.12 Supporting children to stay safe online

Edify Academy does not deliver a statutory online safety curriculum. However, staff may provide age-appropriate guidance or signposting where safeguarding concerns arise.

This may include encouraging children to:

- talk to trusted adults
- seek help if something online makes them uncomfortable
- understand that abuse is not their fault

Any such guidance must remain within professional boundaries.

14.13 Supporting staff in digital safeguarding

Safeguarding in digital contexts can be complex.

Edify Academy supports staff by:

- providing guidance on digital boundaries
- offering safeguarding advice where concerns arise
- updating safeguarding practice in response to emerging risks

Staff must seek advice where uncertainty exists.

14.14 Recording and reviewing online safeguarding concerns

Online safeguarding concerns are recorded and reviewed in the same way as other safeguarding concerns.

Records must reflect:

- the nature of the concern
- how it came to light
- actions taken
- decisions made

Learning from online safeguarding incidents informs future practice.

14.15 Summary

Online safety is an integral part of safeguarding. By maintaining clear digital boundaries, responding appropriately to online harm, and remaining alert to emerging risks, Edify Academy aims to protect children in both digital and physical environments.

****SECTION 15**

SAFEGUARDING RESPONSE PATHWAYS, REFERRALS AND MULTI-AGENCY WORKING**

15.1 Purpose of this section

Safeguarding concerns require timely, structured, and proportionate responses. Clear response pathways ensure that concerns are not delayed, overlooked, or mishandled, and that decisions can be explained and justified if scrutinised.

This section explains how Edify Academy responds to safeguarding concerns from the point of identification through to referral and multi-agency engagement. It clarifies **who does what, when, and why**, and sets out how professional judgement is applied within defined safeguarding pathways.

15.2 Principles underpinning safeguarding responses

Safeguarding responses at Edify Academy are guided by the following principles:

- the welfare of the child is paramount
- action should be taken early to reduce risk
- responses must be proportionate to the concern
- uncertainty should not prevent action
- decisions should be informed, recorded, and reviewed

These principles apply to all safeguarding concerns, regardless of perceived severity.

15.3 Identification of a safeguarding concern

A safeguarding concern may arise through:

- direct disclosure by a child
- indirect comments or behaviour
- observation of changes over time
- information from parents, carers, or other professionals

- online or digital disclosures

Any concern, however minor it may appear, must be taken seriously and reported in line with this policy.

15.4 Immediate safeguarding response

Where a concern indicates that a child is at **immediate risk of serious harm**, the response must be immediate.

In such cases:

1. Emergency services must be contacted by calling **999**
2. A referral must be made to **Children's Social Care**
3. The Designated Safeguarding Lead (DSL) must be informed as soon as possible

Any adult may take these steps if delay would place a child at further risk.

15.5 Reporting concerns to the DSL

All safeguarding concerns that are not immediate emergencies must be reported to the DSL or Deputy DSL without delay.

Staff must provide:

- a factual account of what they have observed or been told
- any relevant context
- their professional concerns

Staff must not attempt to investigate, question others, or resolve concerns independently.

15.6 DSL decision-making and triage

Upon receiving a safeguarding concern, the DSL will:

- review the information provided
- consider the child's circumstances and any known history
- assess risk using professional judgement
- determine appropriate next steps

The DSL may seek advice from safeguarding partners where thresholds are unclear.

15.7 Thresholds for referral to Children's Social Care

A referral to Children's Social Care will be made where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

The DSL will consider:

- the nature and severity of the concern
- whether the concern is isolated or part of a pattern
- the child's age and vulnerability
- any protective factors

Referrals are made promptly and followed up appropriately.

15.8 Early help and lower-level intervention

Not all safeguarding concerns meet the threshold for statutory intervention. However, lower-level concerns may still indicate vulnerability.

Where appropriate, the DSL may consider:

- discussion with parents or carers (where safe)
- signposting to support services
- monitoring and review

Early action aims to prevent escalation and reduce harm.

15.9 Prevent and Channel referrals

Concerns relating to radicalisation or extremism are treated as safeguarding concerns.

Where appropriate, the DSL will make referrals to the **Channel programme** in line with Prevent guidance and local arrangements.

15.10 Referrals involving criminal offences

Where a safeguarding concern indicates that a criminal offence may have occurred, the DSL will liaise with the police and follow their advice.

Edify Academy cooperates fully with criminal investigations and statutory processes.

15.11 multi-agency working

Effective safeguarding relies on collaboration between organisations.

Edify Academy works with:

- Children's Social Care
- the police
- health services
- safeguarding partners
- other professionals involved with the child

Information is shared lawfully and proportionately to support safeguarding outcomes.

15.12 Role of Edify Academy in multi-agency processes

As a tuition provider, Edify Academy's role in multi-agency safeguarding is limited but important.

Edify Academy may:

- share relevant information
- attend meetings where appropriate
- contribute to assessments or plans

Edify Academy does not lead statutory processes but cooperates fully where required.

15.13 Recording referrals and outcomes

All referrals and safeguarding decisions are recorded clearly, including:

- the reason for the referral
- the information shared
- advice received
- actions taken

Outcomes are reviewed to inform ongoing safeguarding practice.

15.14 Escalation where concerns are not addressed

If Edify Academy believes that a safeguarding concern has not been adequately addressed by another agency, the DSL will consider escalation in line with local safeguarding arrangements.

Professional challenge is exercised respectfully and, in the child's, best interests.

15.15 Supporting children during safeguarding processes

Safeguarding processes can be distressing for children.

Where appropriate, Edify Academy aims to:

- communicate clearly and honestly
- provide reassurance
- maintain consistent support during tuition sessions

Support must remain within professional boundaries.

15.16 Supporting staff during safeguarding processes

Staff involved in safeguarding processes may require support and guidance.

Edify Academy provides access to advice and supervision to ensure staff are supported and safeguarding responsibilities are managed effectively.

15.17 Summary

Clear safeguarding response pathways and effective multi-agency working are essential to protecting children. By responding promptly, making appropriate referrals, and cooperating with safeguarding partners, Edify Academy aims to ensure that safeguarding concerns are managed consistently, responsibly, and in the best interests of children.

****SECTION 16**

MONITORING, REVIEW, QUALITY ASSURANCE AND SAFEGUARDING GOVERNANCE**

16.1 Purpose of this section

Safeguarding is not static. Effective safeguarding requires ongoing oversight, reflection, and improvement to ensure that policies and procedures remain relevant, effective, and responsive to emerging risks.

This section explains how Edify Academy monitors safeguarding practice, reviews its effectiveness, and maintains appropriate governance and accountability arrangements. It sets out how safeguarding is embedded into organisational oversight rather than treated as a one-off compliance exercise.

16.2 Safeguarding governance in a tuition setting

Edify Academy does not operate a statutory governing body in the manner of a school. However, it recognises the importance of **clear internal governance arrangements** to ensure safeguarding accountability.

Safeguarding governance at Edify Academy is exercised through:

- organisational leadership (directors, owners, or equivalent)
- the Designated Safeguarding Lead
- internal review and assurance processes

This structure ensures that safeguarding responsibilities are clear, oversight is maintained, and decisions are subject to appropriate scrutiny.

16.3 Leadership oversight of safeguarding

Leadership holds overall responsibility for ensuring that safeguarding arrangements are effective and appropriately resourced.

Leadership oversight includes:

- ensuring safeguarding policies are in place and up to date
- confirming that the DSL and Deputy DSL are suitably trained and supported
- reviewing safeguarding activity and themes
- responding to learning from safeguarding incidents or concerns
- ensuring safeguarding considerations inform organisational decisions

Safeguarding must be considered at leadership level as a core organisational responsibility.

16.4 Monitoring safeguarding practice

Edify Academy monitors safeguarding practice to ensure that policies are being applied consistently and effectively.

Monitoring activities may include:

- review of safeguarding records and referrals
- identification of patterns or recurring themes
- review of low-level concerns
- reflection on response times and decision-making

Monitoring focuses on improving practice rather than attributing blame.

16.5 Quality assurance of safeguarding decisions

Safeguarding decisions involve professional judgement and must be defensible.

Edify Academy undertakes quality assurance activities to ensure that:

- safeguarding concerns are identified promptly
- decisions are proportionate and child-centred
- actions taken align with policy and guidance
- rationales for decisions are clearly recorded

Quality assurance supports consistency and learning across the organisation.

16.6 Learning from safeguarding incidents and concerns

Safeguarding incidents, near-misses, and concerns provide valuable opportunities for learning.

Edify Academy is committed to:

- reviewing safeguarding incidents and responses
- identifying lessons learned
- implementing changes where needed

Learning may inform:

- policy updates
- staff training
- changes to practice or procedures

This reflective approach strengthens safeguarding over time.

16.7 Safeguarding audits and reviews

Periodic safeguarding audits may be undertaken to assess the effectiveness of safeguarding arrangements.

Audits may review:

- compliance with this policy
- training records
- safeguarding documentation
- response pathways

Findings from audits are used to inform action plans and improvements.

16.8 Responding to changes in legislation or guidance

Safeguarding legislation and guidance evolve over time.

Edify Academy monitors changes to:

- statutory safeguarding guidance
- local safeguarding arrangements
- emerging safeguarding risks

Where changes are identified, this policy and associated procedures are reviewed and updated as necessary.

16.9 Policy review cycle

This safeguarding policy is reviewed:

- annually as a minimum
- following significant safeguarding incidents
- following changes in legislation or guidance
- where learning from practice indicates a need for revision

Policy reviews are documented and approved by leadership.

16.10 Staff involvement and safeguarding culture

Safeguarding culture is strengthened when staff feel able to contribute to safeguarding discussions and improvements.

Edify Academy encourages staff to:

- raise concerns about safeguarding practice
- share feedback on policy effectiveness
- contribute to learning and reflection

An open culture supports continuous improvement and safer practice.

16.11 Accountability and challenge

Effective safeguarding governance requires appropriate challenge.

Leadership and the DSL are expected to:

- question safeguarding practice where concerns arise
- challenge decisions constructively
- seek external advice where necessary

Challenge is exercised respectfully and in the interests of safeguarding children.

16.12 External scrutiny and assurance

Edify Academy recognises that safeguarding arrangements may be subject to external scrutiny by:

- local authorities
- partner organisations
- insurers
- commissioners

This policy is designed to demonstrate clear safeguarding arrangements and to support transparency and accountability.

16.13 Record-keeping and governance assurance

Safeguarding records support governance oversight by providing evidence of:

- concerns raised
- decisions made
- actions taken
- learning from practice

Leadership may review anonymised safeguarding data to inform oversight and assurance.

16.14 Safeguarding risk management

Safeguarding risks are considered as part of broader organisational risk management.

This may include:

- identifying safeguarding risk areas
- implementing mitigation measures
- reviewing risk in response to change

Risk management supports proactive safeguarding.

16.15 Summary

Robust monitoring, review, and governance arrangements are essential to effective safeguarding. By maintaining clear oversight, learning from practice, and responding to change, Edify Academy ensures that safeguarding remains a living, responsive, and accountable function.

****SECTION 17**

POLICY IMPLEMENTATION, ACCESSIBILITY AND LINKED POLICIES**

17.1 Purpose of this section

A safeguarding policy is only effective if it is understood, implemented, and accessible. This section explains how this policy is embedded into Edify Academy's day-to-day operations, how it is communicated to those who need to use it, and how it links to other organisational policies and procedures.

This section ensures that safeguarding is not treated as a theoretical or standalone document, but as a **practical framework** that informs behaviour, decision-making, and accountability.

17.2 Implementation of the safeguarding policy

Edify Academy is committed to ensuring that this safeguarding policy is implemented consistently and effectively across the organisation.

Implementation includes:

- ensuring all adults working with Edify Academy are aware of the policy
- integrating safeguarding expectations into induction and training
- embedding safeguarding principles into tuition delivery and supervision
- applying safeguarding procedures consistently when concerns arise

Leadership and the Designated Safeguarding Lead (DSL) are responsible for overseeing implementation and addressing any gaps in practice.

17.3 Accessibility of the policy

This safeguarding policy is made accessible to those who need it in order to fulfil safeguarding responsibilities.

The policy is:

- provided to staff and adults working on behalf of Edify Academy
- available to leadership and internal governance
- shared with external partners where appropriate
- available in formats that support understanding and accessibility

Where required, additional guidance or explanation is provided to ensure that safeguarding expectations are clear.

17.4 Staff understanding and acknowledgement

All adults working with Edify Academy are expected to:

- read this safeguarding policy in full
- understand their safeguarding responsibilities
- confirm acknowledgement of the policy

Acknowledgement of the policy supports accountability and reinforces the importance of safeguarding as a professional responsibility.

17.5 Public-facing safeguarding information

While this is an internal governance-level safeguarding policy, Edify Academy recognises the importance of transparency.

A shorter public-facing safeguarding statement may be derived from this policy for publication on the Edify Academy website or for sharing with parents, carers, and partners.

Public-facing information will be aligned with this policy while remaining accessible and proportionate.

17.6 Consistency across policies and procedures

Safeguarding practice must be consistent across all organisational policies and procedures.

This safeguarding policy should be read alongside other relevant policies to ensure a coherent approach to safeguarding and professional conduct.

Where inconsistencies are identified, safeguarding considerations take precedence.

17.7 Managing updates and version control

Safeguarding policies must remain current.

Edify Academy ensures that:

- the most recent version of the policy is clearly identified
- outdated versions are withdrawn from circulation
- updates are communicated to staff and leadership

Clear version control supports accountability and clarity.

17.8 Responsibility for policy ownership

Ownership of this safeguarding policy rests with Edify Academy leadership.

The DSL is responsible for:

- advising on safeguarding content

- monitoring implementation
- identifying areas for review

Leadership is responsible for approving policy updates and ensuring implementation.

17.9 Policy breaches and non-compliance

Failure to comply with this safeguarding policy may result in:

- additional training or supervision
- disciplinary or contractual action
- referral to external bodies where appropriate

Safeguarding non-compliance is treated seriously and addressed promptly.

17.10 Summary

Effective safeguarding requires more than a well-written policy. It requires clear implementation, accessibility, understanding, and accountability. By embedding this policy into organisational practice, Edify Academy ensures that safeguarding remains active, responsive, and effective.

End of Section 17

APPENDICES

****APPENDIX A**

TYPES OF ABUSE AND SAFEGUARDING ISSUES**

This appendix provides further detail on safeguarding issues referenced throughout this policy.

Abuse may include, but is not limited to:

- physical abuse
- emotional abuse
- sexual abuse

- neglect

Safeguarding issues may also include:

- child sexual exploitation (CSE)
- child criminal exploitation (CCE)
- county lines
- domestic abuse
- honour-based abuse
- forced marriage
- female genital mutilation (FGM)
- bullying and cyberbullying
- online abuse and exploitation
- radicalisation and extremism
- serious violence

Safeguarding concerns may overlap and should be considered holistically.

****APPENDIX B**

SAFEGUARDING RESPONSE OVERVIEW**

While safeguarding responses depend on context and professional judgement, the following overview supports clarity:

- 1. Concern identified**
- 2. Concern recorded promptly and factually**
- 3. Concern reported to DSL or DDSL**
- 4. DSL assesses risk and thresholds**
- 5. Appropriate action taken**
 - emergency response
 - referral to Children's Social Care
 - Prevent / Channel referral
 - early help or monitoring

6. Actions and decisions recorded

7. Review and follow-up as required

This overview supports consistency but does not replace professional judgement.

****APPENDIX C**

GLOSSARY OF KEY TERMS**

- **DSL** – Designated Safeguarding Lead
- **DDSL** – Deputy Designated Safeguarding Lead
- **CSE** – Child Sexual Exploitation
- **CCE** – Child Criminal Exploitation
- **LADO** – Local Authority Designated Officer
- **Prevent** – Duty to prevent radicalisation
- **Channel** – Multi-agency Prevent support programme

This glossary supports shared understanding across the organisation.

****APPENDIX D**

LINKED POLICIES**

This safeguarding policy should be read alongside:

- Professional Conduct / Code of Conduct Policy
- Complaints Policy
- Data Protection and Privacy Policy
- Health and Safety Policy
- Recruitment Policy

Safeguarding considerations take precedence where overlap exists.

****APPENDIX E**

POLICY APPROVAL AND REVIEW**

Policy title: Child Protection and Safeguarding Policy

Organisation: Edify Academy

Approved by: Edify Academy Leadership

Date approved: _____

Last reviewed: _____

Next review due: _____