

Safeguarding Policy

Version 6.0 | September 2026 | Next review: September 2027 (or sooner if statutory guidance changes)

Updated to reflect Keeping Children Safe in Education 2026, in effect from 1 September 2026

Summary of Changes in This Revision (Version 6.0, September 2026)

This policy has been reviewed and updated to reflect *Keeping Children Safe in Education 2026* (DfE), which took effect on 1 September 2026 and replaces the September 2025 edition. The principal changes made to this policy are:

- All references to *Keeping Children Safe in Education* updated to the 2026 edition; all staff are required to read Part One in full (the shorter Annex A summary has been removed from the 2026 guidance).
- Categories of harm updated to reflect new and clarified definitions, including: the move from 'sexting' to 'making or sharing nudes and semi-nudes' (now expressly including deepfake and AI-generated or altered images); self-harm, suicidal ideation and risk of suicide as standalone safeguarding concerns; modern slavery as an indicator of child criminal and sexual exploitation; child-to-parent/carer abuse and persistent verbal abuse; and misogyny and harmful sexual behaviour.
- New sections added on Online Safety, Mobile Phones and Artificial Intelligence; Safer Recruitment and DBS Checks (reflecting changes connected to the Crime and Policing Act 2026); and Supporting Learners Questioning Their Gender.
- Strengthened DSL/DDSL responsibilities: robust and reliable cover arrangements, at least annual filtering and monitoring checks, early consideration of LADO referral, and DSL-to-DSL handover of child protection information when a learner transfers provider.
- Version history and change log added at the end of this policy for audit and inspection purposes.

Scope and Purpose

Enterprise4All is committed to protecting all children, young people, and vulnerable adults from harm whatever their age, gender, ethnicity, disability, language, faith and/or sexual orientation. It ensures the safety of all staff and learners when they are directly linked to Enterprise4All (E4A).

Enterprise4All shares an objective with all educational institutions and agencies working with children, young people, and vulnerable adults to identify those who are suffering or likely to suffer significant harm and take appropriate action to keep them safe from neglect, physical abuse or injury, sexual abuse, emotional abuse, and all other categories of abuse, including radicalisation.

In accordance with *Working Together to Safeguard Children 2026*, Enterprise4All recognises that its safeguarding responsibilities extend to all children, including those living with birth or extended family, those in kinship care (including special guardianship), adopted children, and looked-after children in foster or residential settings. Enterprise4All staff should also consider help, support and protection for unborn children where there are concerns.

This will be achieved by having in place effective systems designed to:

- Minimise risks to the health and well-being of children and vulnerable adults.

- Protect from physical, sexual, and emotional abuse, neglect, bullying, radicalisation and all other categories of abuse.
- Identify instances of concern and initiate appropriate action.
- Enable learners to raise concerns and for those concerns to be actioned.
- Ensure all learners have contact details for and are familiar with the DSL/DDSL.
- Assist local social services on protection matters.
- Encourage healthy lifestyles and positive societal contributions.
- Support learners to fulfil their potential and achieve economic well-being.

Legislation and Guidance

Enterprise4All adheres to the following statutory provisions:

- The Children Act 1989 and 2004
- The Care Act 2014
- The Safeguarding Vulnerable Groups Act 2006
- The Mental Capacity Act 2005
- The Data Protection Act 2018
- The Data (Use and Access) Act 2025
- The Equality Act 2010
- The Human Rights Act 1998
- The Sexual Offences Act 2003
- Prevent Duty (Counter-Terrorism Strategy CONTEST 2023)
- The Crime and Policing Act 2026 – provisions affecting the definition of regulated activity and safer recruitment requirements for supervised volunteers (see **Safer Recruitment and DBS Checks** below)
- *Working Together to Safeguard Children 2026* (DfE, March 2026) – statutory guidance on multi-agency working to help, protect and promote the welfare of children, replacing the 2023 edition
- **Keeping Children Safe in Education 2026** (DfE, September 2026) – statutory guidance for schools and colleges in England, **in effect from 1 September 2026**, replacing the September 2025 edition. All staff, volunteers and governors must read Part One in full; the 2026 edition removes the previous, shorter Annex A summary.
- *The Terrorism (Protection of Premises) Act 2025* (Martyn's Law) – received Royal Assent on 3 April 2025. Statutory guidance under Section 27 of the Act was published by the Home Office on 15 April 2026. The Act is subject to a minimum 24-month implementation period and is expected to come into force in 2027.

Additional guidance includes the Protection of Freedoms Act 2012 and local Safeguarding Board and Prevent Procedures. The policy applies to individuals aged 15 and over, or those deemed vulnerable.

Enterprise4All Commitment

Enterprise4All is committed to:

- Preventing unsuitable people from working with children, young people, and vulnerable adults.
- Providing a safe environment for all learners.
- Promoting safe practices and challenging unsafe behaviour.
- Promoting welfare and not tolerating bullying, harassment, or exposure to radicalisation.

- Fostering an inclusive, anti-discriminatory and anti-racist culture, in line with *Working Together to Safeguard Children 2026*, which places explicit expectations on leaders and practitioners to actively challenge racism and discrimination.
- Challenging misogyny and harmful sexual behaviour wherever it occurs, reflecting the strengthened expectations in *Keeping Children Safe in Education 2026*.

Definition

In the post-school education context, safeguarding refers to measures taken to ensure the well-being and safety of learners and staff. Risks include abuse, neglect, radicalisation, and discrimination. Health and safety issues may become safeguarding concerns if they pose significant risk. Mental health issues, including self-harm, suicidal ideation and risk of suicide, may become safeguarding concerns and are treated by Enterprise4All as standalone indicators requiring the same vigilance as other categories of harm.

Enterprise4All recognises that learners may face multiple or simultaneous harms. Staff should remain professionally curious and alert to the full context of a learner's lived experience, including less visible or hidden forms of harm. Categories of harm include, but are not limited to:

- Physical abuse or violence, including assault or bullying.
- Sexual abuse or exploitation, including group-based child sexual exploitation, which may in some cases meet the threshold for modern slavery.
- Emotional or psychological abuse, including harassment, intimidation, and persistent verbal criticism.
- Neglect, including where a pattern of medical presentations or incidents may itself indicate neglect or abuse.
- Child-to-parent or child-to-carer abuse.
- Radicalisation or extremism.
- Discrimination, hate crimes and misogyny, including harmful sexual behaviour linked to misogynistic attitudes, as highlighted in *Keeping Children Safe in Education 2026*.
- Coercive control and abusive behaviour in intimate or teenage relationships, including domestic abuse affecting a learner's home life or accommodation.
- Honour-based, faith-based or belief-based abuse.
- Online harms, including exploitation facilitated through technology, and the making or sharing of nudes and semi-nudes – the updated term used in *Keeping Children Safe in Education 2026* in place of 'sexting' – which expressly includes deepfake and AI-generated or altered images.
- Misinformation, disinformation and conspiracy theories, including content generated or manipulated using artificial intelligence (AI).
- Self-harm, suicidal ideation and risk of suicide, recognised in *Keeping Children Safe in Education 2026* as standalone safeguarding concerns.

Enterprise4All also recognises additional vulnerabilities highlighted in *Keeping Children Safe in Education 2026*, including young carers and learners with special educational needs and disabilities (SEND), who may be less able to recognise, disclose or articulate abuse due to isolation, communication barriers, intimate care needs or dependency on adults for their care.

Responsibilities

Enterprise4All's Management Team ensures compliance with safeguarding procedures and is accountable for ensuring effective policies and procedures are in place in accordance with statutory guidance.

Designated Safeguarding Lead (DSL): Louise Jolly Email: louise@enterprise4all.co.uk | Tel: 01254 693999

Deputy Designated Safeguarding Lead (DDSL): Irfana Desai Email: irfana@enterprise4all.co.uk | Tel: 01254 693999

The DSL and DDSL will:

- Refer suspected abuse and Prevent cases to the relevant investigating agencies.
- Act as a source of advice and support within Enterprise4All.
- Attend and contribute to case conferences.
- Ensure all staff are trained and informed, with DSL training renewed at least every two years in line with *Keeping Children Safe in Education 2026*.
- Maintain robust, clear and reliable cover arrangements for DSL/DDSL absence so that a trained and contactable deputy is always available, as required by *Keeping Children Safe in Education 2026*.
- Ensure filtering and monitoring systems across all internet-connected devices are checked at least annually, with checks documented and reported to the Board of Governance.
- Consider referral to the Local Authority Designated Officer (LADO) at an early stage whenever a safeguarding concern is raised about a member of staff, volunteer, trainee or contractor, applying the same threshold regardless of employment status.
- Liaise with local authorities, including regarding Looked After children.
- Maintain accurate, secure records and ensure the policy is reviewed annually, or sooner if statutory guidance changes.
- Ensure all staff and volunteers are aware of their safeguarding responsibilities, including at induction.
- Liaise with other agencies post-programme where necessary, including holding a DSL-to-DSL conversation to support the transfer of child protection information whenever a learner moves to another provider, in addition to any written handover.
- Promote and evidence an inclusive, anti-discriminatory and anti-racist culture across Enterprise4All, actively challenging discrimination and bias in line with *Working Together to Safeguard Children 2026*.
- Support a coordinated, family-centred approach to early help and support, consistent with the *family help* model introduced in *Working Together 2026*, which brings targeted early help and statutory support into a more seamless offer for learners and their families.

It is the responsibility of all staff and volunteers to alert the DSL or DDSL whenever they believe a child or vulnerable adult has been abused or is at risk of abuse. Staff should not make promises of confidentiality, should limit questioning to what is necessary to understand the concern, and should not attempt to investigate allegations themselves, as this could jeopardise any subsequent investigation or legal proceedings.

Procedure

When harm is disclosed:

- Listen openly and avoid leading questions.
- Record discussions accurately, including setting, time, and people present. Record what the child or vulnerable adult said verbatim wherever possible.
- Never promise confidentiality; explain that the disclosure must be reported to the DSL/DDSL.

- Transfer notes to the Safeguarding Log and refer to the DSL/DDSL within 24 hours.
- The DSL will decide on appropriate action and complete referral forms if needed. A copy of all referral forms and internal incident reports will be retained securely.
- Where there is insufficient evidence to sustain an allegation, this will be recorded on an incident form and stored in a secure file separate from the individual's record.
- Reports involving staff, trainees, sessional workers or contractors are escalated to the Directorate and handled in the same way regardless of employment status.
- Feedback from external agencies is recorded on Enterprise4All's Safeguarding Incident and Disclosure Report form.
- The Board of Governance receives safeguarding updates at every meeting.
- Weekly management meetings and Governance meetings include safeguarding and Prevent updates.

In line with *Working Together to Safeguard Children 2026*, where a serious child safeguarding incident occurs or is identified, Enterprise4All will ensure that any required notification is made promptly. Rapid reviews must be submitted within 15 working days of the serious incident notification (SIN). Notifications must be made even where the names of child victims are not yet known.

Online Safety, Mobile Phones and Artificial Intelligence (AI)

Reflecting the strengthened online safety expectations in *Keeping Children Safe in Education 2026*, Enterprise4All:

- Assesses online risks to learners using the established '4Cs' framework – content, contact, conduct and commerce – including risks arising from generative AI.
- Recognises that generative AI can be used to create or alter sexual and other harmful imagery ('deepfakes') and to produce misinformation or disinformation, and treats this as a safeguarding issue rather than solely a technical one.
- Uses the term 'making or sharing nudes and semi-nudes' in place of 'sexting' in staff training, reporting materials and learner-facing guidance, consistent with current terminology, and includes AI-generated or altered images within this definition.
- Maintains appropriate filtering and monitoring systems across all Enterprise4All devices and networks, with technical effectiveness checks carried out at least annually and reviewed by the DSL, with records retained for inspection.
- Operates a phone-free approach to teaching and learning sessions wherever practicable, reflecting the default expectation that education settings should be phone-free environments during lesson time, whilst recognising the additional considerations relevant to adult and post-16 learners (for example, personal safety, caring responsibilities and employer contact).
- Provides staff and learners with guidance on recognising and reporting online harms, including misinformation, disinformation and AI-generated content, as part of induction and ongoing training.

Safer Recruitment and Disclosure and Barring Service (DBS) Checks

Enterprise4All follows the safer recruitment practice set out in *Keeping Children Safe in Education 2026*, including:

- Ensuring that no individual – whether an employee, volunteer, sessional trainer, associate or work-experience supervisor – begins work with learners until Enterprise4All has received both a satisfactory enhanced DBS check and, where the role involves regulated activity, a barred list check.
- Reflecting changes connected to the Crime and Policing Act 2026, under which the previous exemption allowing some supervised volunteers to work without a barred list check no longer applies where a volunteer undertakes specified activity (such as teaching, training or supervising learners) on three or more

days within a 30-day period; such volunteers are treated as undertaking regulated activity regardless of supervision arrangements. Enterprise4All has reviewed existing volunteer and work-experience arrangements against this threshold and will re-check any volunteer whose role now meets it.

- Treating allegations against trainee, agency, sessional and contracted staff in exactly the same way as allegations against permanent employees.
- Making a referral to the DBS wherever an individual meets the relevant harm threshold, including in respect of volunteers.
- Reviewing single central record entries regularly to confirm they reflect the checks above.

Supporting Learners Questioning Their Gender

Where a learner aged under 18 discloses that they are questioning their gender or wishes to socially transition, Enterprise4All will respond through a safeguarding lens, in line with the statutory guidance introduced in *Keeping Children Safe in Education 2026*. In practice, this means that:

- Enterprise4All will not itself initiate a social transition, and will only respond to individual requests raised by a learner or their parent(s)/carer(s).
- Parents and carers will be involved as a priority, except in the rare circumstances where doing so would place the learner at greater risk of harm; any decision not to involve parents will be recorded and agreed with the DSL.
- Single-sex spaces and facilities (such as toilets and changing areas) continue to be provided on the basis of biological sex, and single-sex sporting activity is maintained without exception where safety or fairness require it.
- Staff will keep a learner's disclosure confidential only insofar as this does not conflict with wider safeguarding duties, and will always inform the DSL/DDSL.

This section applies to learners under the age of 18. Enterprise4All's approach to supporting adult learners (18 and over) is set out in the Equality, Diversity and Inclusion Policy.

Martyn's Law – Terrorism (Protection of Premises) Act 2025

The Terrorism (Protection of Premises) Act 2025, commonly known as Martyn's Law, received Royal Assent on 3 April 2025. It is named in tribute to Martyn Hett, one of the 22 victims of the 2017 Manchester Arena attack, following a sustained campaign by his mother, Figen Murray.

On 15 April 2026, the Home Office published statutory guidance under Section 27 of the Act. This guidance sets out how those responsible for premises and events in scope should understand and meet the requirements of the legislation in practice. The Act is subject to a minimum 24-month implementation period from the date of Royal Assent (3 April 2025) and is not expected to come into force until 2027. There is therefore no current legal requirement to comply; however, Enterprise4All uses this implementation period to prepare proportionately.

Scope and Tier Position

The Act applies a tiered framework based on the number of people reasonably expected to be present at a qualifying premises or event. As a privately owned independent training provider, Enterprise4All does not benefit from the standard-tier exemption that applies to state-funded further education settings. Enterprise4All's applicable tier is therefore determined by its expected attendance:

- Standard Tier: premises or events where 200–799 individuals are reasonably expected to be present.
- Enhanced Tier: premises or events where 800 or more individuals are reasonably expected to be present.
- Out of scope: premises or events where fewer than 200 individuals are reasonably expected to be present.

Enterprise4All's Position: Given Enterprise4All's typical delivery cohort sizes, the organisation is currently assessed as falling below the 200-person threshold and therefore out of scope of the Act. Nonetheless, in line with Home Office guidance, Enterprise4All is committed to having proportionate preparedness plans in place for the safety of learners and staff, and will reassess its position if attendance patterns change materially.

Responsibilities under Martyn's Law

Whilst Enterprise4All is currently assessed as out of scope, the DSL will:

- Monitor the implementation period and any updates to Home Office Section 27 guidance or DfE guidance for education providers.
- Reassess Enterprise4All's scope position annually, or immediately if attendance at any session or event is expected to reach or exceed 200 people.
- Ensure that existing emergency procedures – including lockdown, evacuation, invacuation, and communication protocols – are reviewed and documented, consistent with the preparedness framework set out in the Section 27 guidance.
- Ensure all staff are aware of counter-terrorism preparedness through the Home Office ACT Awareness e-learning and equivalent resources, in line with guidance on the ProtectUK platform.
- Notify the Board of Governance of any change in scope status and ensure governors are briefed on Martyn's Law obligations at least annually.

If Enterprise4All's premises or events enter scope (i.e. 200 or more people are reasonably expected to be present), the organisation will:

- Appoint a Responsible Person, as defined under Schedule 1 of the Act, to oversee compliance.
- Notify the Security Industry Authority (SIA) as the statutory regulator.
- Implement and document public protection procedures covering evacuation, invacuation, lockdown, and communication in the event of a terrorist attack.
- Comply with Enhanced Tier requirements, including appointing a Designated Senior Individual (DSI) and documenting how risks are mitigated and vulnerabilities reduced, if attendance regularly meets or exceeds 800 people.

Enterprise4All will not seek or pay for external consultancy services solely for Martyn's Law compliance. Free resources from ProtectUK (protectuk.police.uk) and the National Protective Security Authority (NPSA) will be used in the first instance, consistent with Home Office guidance that compliance should not require specialist or paid services.

Reporting and Monitoring

The Safeguarding Group monitors policy implementation, chaired by the DSL and the Board. Safeguarding contact information is provided to learners at every session and included in learner packs and on the website.

Enterprise4All collaborates with local Safeguarding Boards, the Lancashire Prevent Partnership, LANPAC and The Lancashire Safeguarding Partnership.

In accordance with *Working Together to Safeguard Children 2026*, Enterprise4All is committed not only to having safeguarding systems in place, but to evidencing their effectiveness and demonstrating measurable impact on outcomes for learners and their families.

This policy is available on the website and is shared with all staff and stakeholders, including governors.

Policy version: 6.0 | **Date:** September 2026 | **Next review:** September 2027 (or sooner if statutory guidance is updated)
Approved by: Board of Governance | **DSL:** Louise Jolly | **CEO:** Malin Patel

Version History and Change Log

Version	Date	Summary of change
4.0	2024–25	Prior annual review (see previous version for detail).
5.0	April 2026	Incorporated Working Together to Safeguard Children 2026 and Martyn’s Law (Terrorism (Protection of Premises) Act 2025) provisions, including Section 27 statutory guidance.
6.0	September 2026	Updated to Keeping Children Safe in Education 2026 (effective 1 September 2026): revised definitions of abuse (nudes and semi-nudes/deepfakes, self-harm and suicidal ideation, modern slavery, child-to-parent abuse, misogyny); new sections on Online Safety, Mobile Phones and AI, Safer Recruitment and DBS Checks (Crime and Policing Act 2026), and Supporting Learners Questioning Their Gender; strengthened DSL/DDSL cover, filtering/monitoring and LADO referral duties.

Key references: Keeping Children Safe in Education 2026 (DfE, effective 1 September 2026); Working Together to Safeguard Children 2026 (DfE, March 2026); Children Act 1989 & 2004; Care Act 2014; Data Protection Act 2018; Data (Use and Access) Act 2025; Equality Act 2010; Crime and Policing Act 2026; Counter-Terrorism and Security Act 2015; Terrorism (Protection of Premises) Act 2025 (Martyn’s Law), including Section 27 statutory guidance (Home Office, April 2026)