enko education

Child Safeguarding Policy

2026



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Overview



Enko Education's Child Safeguarding Policy reflects our commitment to promoting safe practices that create a conducive environment for children to learn and grow.

As an education company, Enko Education recognises the need to create a safe environment so it can become a learning environment. Because of their age, Enko learners are vulnerable and creating a safe environment requires special attention and a proactive approach. We at Enko Education want to see children and young people thrive regardless of their gender, sexuality, ethnic grouping, faith, culture, family income, disability, or other defining features.

Therefore, we are committed to ensuring that all children and young people who are part of Enko Education have access to quality education while feeling safe within Enko schools.

OVIC framework

	Owner	Veto	Influencers	Contributors
General Child protection and safeguarding Policy	Group Safeguarding Manager	Enko Education CEO	Head of Learning and Teaching	HoS and Child safeguarding Leads
Incident in school level 1 to 2	Child safeguarding Lead	Group Safeguarding Manager	Head of Learning and Teaching	HoS
Incident in school level 3	HoS	Child safeguarding Lead	Head of Learning and Teaching	Group Safeguarding Manager
Reporting to CEO incident level 3	Group Safeguarding Manager	CEO	Exco Board of Directors	Head of Learning and Teaching
Reporting to Board of Directors	CEO	Not Applicable	Head of Learning and Teaching	Group Safeguarding Manager

Given the diversity of contexts across our schools and countries, you are not permitted to delete or modify any section of the Child safeguarding Policy. However, you may add specific rules or principles that are relevant to your school's context.

Any additions must be formalised through an ad hoc document, signed by the following individuals:

- The Head of School (HoS)
- The Child Safeguarding Lead
- The Group Safeguarding Manager

Please note that during an audit, this signed document will be required as official proof of any additions made.

Policy scope and principles



The Child Protection and Safeguarding Policy is endorsed by our Executive Committee and adopted by the entire organisation. The policy is applied to anybody who has access to children and young people and any contractors working on any Enko Education school site.

This policy sets out our principles and expectations, as well as the procedures and processes, which must be adopted by all our schools and across our group as a whole. The policy also describes the steps that must be taken in meeting our commitment to safeguarding students, at both school, regional and group level.

At Enko Education, we are committed to safeguarding and promoting the welfare of children and young people and we expect all our employees and volunteers and any contractors / consultants and partner agency staff in our schools to share this commitment. In line with this, we expect them to recognise where a student is at risk of, or is actually being harmed, and to do all they can to reduce further risk or harm.

At Enko Education, we adhere to the following basic child protection and safeguarding principles:

- A child's welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in school.
- Every student is entitled to a rich and broad curriculum that helps to equip them to keep themselves safe.
- Every adult in school must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other professionals to ensure the protection of students.
- Our guiding principle throughout is 'the best interests of the students'.
- All students have the same equal rights to protection, but we recognise that we need to do more for some because of their special educational needs, disability, gender, religion, or sexual orientation.

Child safeguarding is in line with the Enko Education values



Policy aims and objectives



- Provide a safe and happy environment to enable students to thrive and learn.
- Outline the systems and processes we all take to ensure that students remain safe at school.
- Raise awareness to all employees of safeguarding/child protection issues and define their roles and responsibilities in reporting possible cases of abuse.
- Identify students who are suffering, or likely to suffer harm.
- Ensure effective communication between all employees on child protection and safeguarding issues.
- Set effective procedures for employees/volunteers or third-party individuals who encounter any issues in relation to child protection/safeguarding to follow.
- Be clear with all parties, including students and their parents/carers, regarding our approach to safeguarding and child protection, through the provision of clear and well communicated policies.



Definitions



Child protection

Child Protection is the core element of safeguarding and is defined as the responsibility to protect children who are suffering or likely to suffer from harm as a result of abuse or neglect.

Child safeguarding

Child safeguarding designates the responsibility that organisations have, to make sure their staff, operations, and programmes do no harm to children, meaning that they do not expose children to the risk of harm and abuse, and that any concerns the organisation has about children's safety within the communities in which they work, are reported to the appropriate authorities.

Child protection vs child safeguarding

Child protection in the international context describes the work to strengthen laws, policies and systems, which are designed to protect children in a given country, in his or her own family and community.

Child Safeguarding is the responsibility that organisations have to ensure their staff, operations, and programmes do not harm children.

If the preventative work around safeguarding issues is not appropriate or extensive enough, students identified as being a concern may move to being identified as being at risk of significant harm. Although other factors outside of the schools' control may also influence this, the purpose of the policy is to ensure that at Enko Education we take whatever measures are possible to avoid this from happening.

Safeguarding students under international and african child rights frameworks



Given our international and African context, we recognise and accept our responsibility to safeguard all students under both the **United Nations Convention on the Rights of the Child (1989)** and the **African Charter on the Rights and Welfare of the Child (1990)**. These two foundational instruments collectively affirm our duty to protect every child from harm and to promote their wellbeing, dignity, and development in all school environments.

We acknowledge our specific obligations under the following Articles of the UN Convention:

- **Article 3** | The best interests of children must be the primary concern in all decisions affecting them.
- **Article 13** | Children have the right to access and share information, provided it does not cause harm to themselves or others.
- **Article 19** | Children have the right to be protected from all forms of physical and mental harm or mistreatment.
- **Article 36** | Children must be protected from any activity that exploits or harms their welfare and development.
- **Article 37** | No child should be subjected to cruel, inhuman, or degrading punishment or treatment.

The complete text is available at: UNICEF – Rights Overview (1989)

Complementing these international commitments, we also affirm our obligations under the African Charter on the Rights and Welfare of the Child (1990), which provides a contextualised framework that reflects Africa's social and cultural realities. We commit to upholding the following key Articles:

- **Article 4** | The best interests of the child shall be the primary consideration in all actions concerning them.
- **Article 7** | Every child capable of communicating has the right to freely express their opinions and disseminate them within the limits of the law.
- **Article 8** | Every child shall have the freedom of thought, conscience, and religion.
- **Article 15** | Children must be protected from economic exploitation and from performing work that could harm their education or development.
- **Article 16** | Children must be protected from all forms of torture, inhuman or degrading treatment, and from abuse or neglect by parents, guardians, or others responsible for their care.
- **Article 27** | Children must be protected from all forms of sexual exploitation and abuse.

The full text of the Charter can be accessed at: African Committee of Experts on the Rights and Welfare of the Child (2022)

Roles and responsibilities

Executive committee (ExCo) and central team

Our ExCo and central team recognise their ultimate responsibility to ensure that the group and all schools understand and follow the guidance provided by this and all other safeguarding related documents.



Heads of school and senior leadership teams in schools

Heads of school and senior leadership team in each school will:

- Ensure that the policy is implemented across their school and followed by all employees and adults working with children.
- Allocate sufficient time and resources to enable the Child Safeguarding Lead (CSL) and any CSL deputy to carry out their role effectively.
- Ensure that the culture of the school facilitates concerns being raised and handled sensitively.
- Ensure that safeguarding is addressed through the curriculum ensuring that children throughout the school are taught about keeping themselves safe, including online safety.
- Ensure the school site is secure.
- Ensure there are clear roles, responsibilities and strategies for delivering and maintaining an effective filtering and monitoring system for e-safety.
- Customise this policy for their particular school.
- Ensure that local mapping of legislation, guidance and supportive agencies is undertaken and added to the school's customised version of this policy.
- Only deploy employees who will have unsupervised contact with children, where safe recruitment procedures have been followed.
- Maintain a record on the HRIS of all training undertaken by employees in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in this policy.

Roles and Responsibilities



Child Safeguarding Lead (CSL) in a school

Every school will identify a named person designated as the Child Safeguarding Lead (CSL), to support the Head of School on each site. This means that schools with split sites may have Deputy Leads on each site for safeguarding with the CSL having an overview. This person/people will: receive appropriate safeguarding training to equip them to undertake their role; be given sufficient time in the working day to undertake the role; and be able to prioritise safeguarding when necessary.

The Child Safeguarding Lead should be a senior member of staff with the authority to make decisions, a strong understanding of safeguarding practices, and a trusted, positive relationship with students and the school community.

The Child Safeguarding Lead role is guided by two principles

1. **Confidentiality should be respected as far as is reasonably possible**
2. **The welfare of the child is always paramount**

Being guided by these principles the Child Safeguarding Lead will:

- Play a key role in ensuring that the school takes action to support any student who may be at risk.
- With the school leadership, make sure that all employees, both teaching and non-teaching, are aware of their responsibilities in relation to safeguarding and child protection.
- Have appropriate training in addition to the basic training that all other employees receive. This includes attending Enko Education Child Safeguarding Lead training at least every two years and actively participating in their CSL Regional Networking meetings to ensure they stay updated on safeguarding issues.
- Collate and keep accurate and confidential records of any concerns about children, this should include ensuring robust action plans are implemented at the earliest opportunity which are captured in writing and are reviewed regularly.
- Take a lead role in reviewing the filtering and monitoring of schools online access.
- Have a clear understanding of the local expectations around safeguarding, who to contact, what agencies exist and how to contact them.
- Ensure that the entire school community knows who the CSL/ CSL Team is in their setting.
- Be familiar with local regulations, procedures and agencies who can offer support for safeguarding matters.

All employees have the responsibility to report to the Child Safeguarding Lead any concern they have about the safety of any child in their care. The Child Safeguarding Lead's responsibility is to make decisions about what to do next and then to take appropriate action.

Roles and Responsibilities



All employees (including employees of partner organisations and contractors having contact with children)

All employees or contractors will:

- Ensure they are familiar with and follow the policy and all other safeguarding related documents.
- Be subject to safer recruitment processes and checks prior to starting at the school/organisation (in exceptional cases an action plan/risk assessment can be in place to ensure the employee is supervised until all checks are completed.)
- Be alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children, knowing what to do if a child tells them he/she is being abused, exploited, or neglected.
- Know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the Child Safeguarding Lead (or a deputy) and children's social care in their area. Employees should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- Be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse. Nor should a victim ever be made to feel ashamed for making a report.
- Record any concerns and report these to the Child Safeguarding Lead on the school's concern form
- Be aware of who the Child Safeguarding Lead is in the school they are working in and how they can be contacted.
- Follow the procedures outlined in this document when/if concerned about any child.
- Support students, employees or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding and safe recruitment training (and refresher training as required by Enko Education).

All employees and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the Enko Education code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

Roles and responsibilities



All employees who have occasional or supervised contact with children (including employees from partner and contracted organisations) will:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that where appropriate, all partner agency staff/contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these employees, (appropriate to the role and contact they will have with children), before they commence their role in any Enko Education school.
- Where partners/contractors do not have their own safeguarding or child protection policy, the Enko Education application notes will be used, and partners/contractors asked to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in this document at all times.
- Be provided with guidance on appropriate safe working practice.



Power dynamics between adults and students

Staff members are expected to be mindful of the inherent power imbalance in the relationship between adults and students. Since students are a vulnerable and impressionable population, the words and guidance of staff carry significant weight and can strongly influence them. The role of the educator is to encourage inquiry and safe exploration as students develop their own identities. Therefore, staff must avoid expressing personal views on sensitive topics, such as politics or religion.

Representatives must never:

- Force their political views on children.
- Impose their religion on children.
- Impose their cultural practices on children.

Training expectation



Enko Education will ensure that:

- All employees, volunteers and partner agencies in schools are provided with appropriate general safeguarding training on joining the organisation and then undertake annual refreshers.
- All employees receive safeguarding and child protection (including online safety) updates throughout the school year (for example, via email and e-bulletins) to provide them with relevant skills and knowledge to safeguard students effectively.
- Relevant documents are made available in a range of relevant languages.
- Employees and volunteers are supported and have the necessary skills to recognise and take appropriate action regarding students who are at risk, or potentially at risk.
- Those who have the Child Safeguarding Lead responsibility in schools have appropriate, up to date knowledge and that they access appropriate additional and specialist. This will be refreshed every two years.
- All employees and volunteers are subject to a full induction, which includes an overview of what to do and who to contact if concerned about a student.
- Appropriate employees are trained in safe recruitment. This safer recruitment training must be renewed every year.
- Any new member of staff should follow child safeguarding training online during the onboarding in the HRSI and in schools during the first week of employment.

Any student who has or is suffering from any form of harm will receive support. Once agreed with any investigating agency (if involved), students can be offered direct support through school counsellors or external agency input. All Enko Education schools will hold information in relation to local, regional, or national bodies that may be able to offer direct support in these circumstances.

Forms of abuse

There are a significant number of ways that students may be exposed to risk and danger. All require a response. Abuse is defined as any form of maltreatment of a child. This can manifest itself as direct harm to a child, or by a failure to take action to protect a child who is at risk of, or already suffering harm.



The more commonly referred to types of abuse are:

Corporal punishment and physical abuse

This can include any direct acts of physical injury upon a child or young person, which are not the result of an accident. This can also include tasks and errands, which clearly exceed the capacity of the child to manage safely.

Representatives must never:

- Hit or otherwise physically assault or physically abuse children : pushing, pinching, pulling an ear, pulling hair, slapping, etc.
- Use any form of corporal punishment as a way of maintaining or restoring discipline: hitting with a ruler, hitting the head, etc.
- Force a child into an unpleasant physical position: kneeling, having a pen on the head, etc.

Forms of abuse

Emotional and verbal abuse

This is persistent and psychological mistreatment, which severely impacts a child's behaviour and development. It translates to a denial of respect and may take the form of persistent personal criticism, humiliation or discrimination without any positive interest or conce

Representatives must never:

- Use their position of authority over children by making them: run errands, do domestic work or carry out other forms of economic exploitation.
- Use language, make suggestions or offer advice, which are inappropriate, offensive or abusive.
- Act in ways intended to shame, humiliate or degrade children.
- Discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- Show discrimination based on race, culture, age, gender, disability, religion, sexuality, intellectual skills or political opinion.
- Abuse or victimise children through social media or online.

Neglect

This relates to the persistent failure to prevent the exposure of a child to danger, or the extreme failure to carry out important aspects of care, medical or physical, which results in the significant impairment of the child's health or development. This can occur when a staff member fails to adequately supervise the safety of children or exposes a child to extreme conditions or preventable risk of injury. Violations of child labour laws also need to be considered.

Representatives must never:

- Place a child at risk of abuse or exploitation, be aware of these and not do anything about it.
- Ignore a child when he or she speaks. Say to a child that they don't have time to listen to him or her.
- Underestimate a child's words and stories.

Forms of abuse

Sexual abuse

This includes all forms of sexual acts perpetrated upon a child by another person as well as sexual abuse and sexual harassment. This issue is more complex when it occurs between older children of similar age groups. The main issue concerns exploitation, which is considered to have occurred if an adult perpetrated the act on a child and/or involved a misuse of power, services, age or authority, or the use of physical force or emotional manipulation by children from a peer group. This can also include exposure or failure to prevent the exposure of children to all forms of pornography and sexual acts.

Grooming

A process by which a person prepares a child, significant adults and the environment for the abuse of the child. Grooming can happen online, in organisations and in public. Grooming can be used for the sexual abuse and exploitation of a child. Children can be groomed by a stranger or by someone they know, such as a teacher or family member.

What makes children vulnerable to grooming?

Grooming can affect any child. However, children who may be particularly vulnerable include:

- Children who are exploring their sexuality and identity online
- Those who are experiencing difficulties with peers, including social and communication problems
- Children with low self-esteem and confidence (those who want to be liked)
- Children experiencing academic, learning and social challenges
- Children who have limited awareness about online risks (they may not recognise 'stranger danger' in the online world, and they may see all online contacts as friends)
- Children whose online activity isn't appropriately supervised or monitored.

Sexual harassment

This includes all forms of behaviour characterised by the making of unwelcome and inappropriate sexual remarks or physical advances in schools or social situations.

Sexual Harassment can take place in person or online and can be perpetrated verbally, in writing or in person.

Sexting

Sexting is when someone shares sexual, naked, or semi-naked images or videos of themselves or others or sends sexually explicit messages.

Sexting may also be referred to by students as trading nudes, dirties or pic for pic.

There are many reasons why a student may want to send a naked or semi-naked picture, video, or message to someone else:

- They may find it difficult to say no if somebody asks them for an explicit image, especially if the person asking is persistent or has groomed the child to gain their trust.
- Joining in because they think that 'everyone is doing it'.
- Boosting their self-esteem.
- Flirting with others and testing their sexual identity.
- Exploring their sexual feelings.
- To get attention and connect with new people on social media.

Students often do not realise that in creating and sending these images they are potentially committing a criminal act. Ideally, we would not want to deal with these issues as criminal acts. Learning and support can be a more beneficial way of tackling sexting. Employees must report any incident of sexting to the CSL via the school concern system.

Forms of abuse

Peer to peer abuse

We recognise that children are capable of abusing their peers. Where an allegation is made that one child may have abused another, this will always be taken seriously and dealt with as a safeguarding matter. This type of peer-on-peer behaviour will not be tolerated. It can happen both inside and outside of school and online. Peer on Peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi nudes images and/or videos (sexting);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals, this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

Sexual violence and harassment

This can occur between two children of any age and sex, from primary through to secondary stage. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All employees must maintain an attitude of 'it could happen here'.

Any report of peer-on-peer abuse should be taken seriously it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

All employees should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Anti-Bullying

Bullying is a safeguarding matter and if left unresolved can become a more serious child protection issue. Employees at every level will take seriously any concerns raised in relation to the bullying of any student. Action will always be taken to investigate the concerns and to prevent repeat incidents or behaviours. Bullying may involve either face-to-face or the misuse of social media or technology. Each school should have its own policy and approach to restorative practices and all our schools will demonstrate a commitment to help resolve specific issues. Enko Education has a separate Anti-Bullying Policy Statement which must be referred to and fully referenced in relation to the bullying of any student.

Anti-Bullying (Including online-Bullying) Policy _ Safeguarding_2025

Mental health and safeguarding



Mental health

We are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School employees, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If an employee has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by capturing the concern on the school's concern form and speaking to the Child Safeguarding Lead or a deputy.

Self-harm

Self-harm can take a number of physical and/or emotional forms. There are many reasons why children and young people try to hurt themselves. Once they start, it can become a compulsion. This is why it is so important for schools to spot it as soon as possible and do everything possible to help. Self-harm is not usually a suicide attempt or a cry for attention. Instead, it is often a way for young people to release overwhelming emotions and a way of coping. So, whatever the reason, it should be taken seriously.

- Young people will sometimes go to great lengths to cover self-harm scars or injuries and/or they will explain any indications of self-harm as accidents.
- There are some common themes that may help employees identify concerns including:
- Physical indicators such as cuts, bruises, burns, bald patches (where hair has been pulled out).
- Emotional indicators such as depression, sudden weight loss, drinking or drug-taking, or unusual eating habits and isolation or withdrawal.



If an employee suspects that a student is self-harming this must be referred to the Child Safeguarding Lead who will consider the next steps. It is likely that this will require discussion with the student involved and their Parents/Carer's to agree a course of action or referral to an organisation that may be able to support the student.



Children who are absent from education for prolonged periods and/or repeated occasions

All employees should be aware that children who are absent for prolonged periods and/or repeated occasions, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Employees should be aware of their school's attendance policy and unauthorised absence and children missing from education procedures.

Fabricated and induced illness

In fabricated illness the perpetrator (usually a parent or carer) does not directly harm the child but reports to doctors a clinical story which is eventually established to be fabricated. Whereas with induced illness the perpetrator inflicts direct (hands on) harm to the child. This can range from trivial injuries such as pricking the child to add blood to urine, through to suffocation.

All schools must have a robust attendance policy to aid the monitoring of child illnesses. When a parent reports that a child has an illness which requires a health plan the school must work in collaboration with the medical practitioner treating the child.



There are specific safeguarding issues that can put children at risk of harm (listed below), all areas will be covered in Enko Education initial training courses and must be included in annual refresher training or during a safeguarding training programme delivered throughout the school year. This helps to ensure all employees are aware of the signs and indicators of these specific issues to enable early intervention support to be put in place within schools or referrals made to specialist outside agencies.

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Radicalisation and extremism

Children can be vulnerable to extremist ideology and radicalisation. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, employees should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Enko Education values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Any freedom of speech which promotes violence against anyone or anything else will not be tolerated.



Female genital mutilation (FGM)

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with through the procedures set out in this document i.e., concerns and signs of FGM must be reported to the Child Safeguarding Lead. FGM is illegal in 26 countries across Africa and the Middle East.

We recognise that this is cultural practice in some countries and not always seen as abusive. While not condoning the practice, we need to be aware of the sensitivities surrounding it and always act in the student's best interests.

Forced marriages (FM)

A Forced marriage (FM) is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g., threats, physical violence, or sexual violence) or emotional and psychological pressure (e.g., if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

As with FGM and some other cultural practices, we need to be aware of the cultural sensitivities but always act in the students' best interests.

Domestic abuse

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'.

Modern slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

The above is not an exhaustive list of all the potential forms of abuse which employees may have to deal with on occasions.

Identifying actual or likely occurrences of abuse



There are a number of ways in which abuse may become apparent:

- A child discloses abuse.
- Someone else discloses that a child has told him/her that a child is being abused or that he/she strongly suspects abuse.
- A child may show signs of physical injury for which there appears to be no satisfactory explanation.
- A child's behaviour may indicate that it is likely that he/she is being abused.
- A member of staff's behaviour or the way in which he/she relates to a child causes concern.

Listed below are a number of indicators; however, they may vary based on various factors, including the local cultural and economic context. This list is not exhaustive but a guideline to help establish whether some form of child abuse or exploitation has taken place.

Indicators of possible physical abuse

- Any injuries or signs of injury with no satisfactory explanation.
- Injuries sustained on the body in places that are not normally exposed to falls, rough games, etc.
- Injuries that have not received medical attention.
- Reluctance to change for, or participate in, games or swimming.
- Bruises, bites, burns, fractures etc with no satisfactory explanation.
- Cuts/scratches/substance abuse.

Signs of emotional abuse (to be compared with behaviour based on the culture of the community)

- Changes or regression in mood or behaviour.
- Depression/aggression/extreme anxiety.
- Nervousness, frozen watchfulness.
- Obsessions or phobias.
- Sudden under-achievement or lack of concentration.
- Inappropriate relationships with peers and/or adults.
- Attention-seeking behaviour.
- Persistent tiredness.
- Running away / stealing / lying.
- Isolation / loneliness.
- Repeated or unusual lateness or absences from school.

How to recognise abuse or exploitation



Indicators of possible sexual abuse

- Any allegations made by a child concerning sexual abuse.
- Child who is excessively preoccupied with sexual matters and has detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play.
- Sexual activity through words, play or drawing.
- Child who is sexually provocative or seductive with adults.
- Reported inappropriate bed sharing arrangements at home.
- Severe sleep disturbance, with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Mutilation.
- Repeated urinary infections or unexplained tummy pains.
- Infections and/or symptoms of sexually transmitted diseases.

Indicators of possible neglect

- Under nourishment and failure to grow.
- Constant hunger, stealing or gorging food.
- Untreated illnesses.
- Signs of inadequate care.
- Excessive weight loss.
- Risk-taking – drugs and alcohol.

Becoming aware of abuse can cause a multitude of emotional reactions, that are specific to the individual. Whatever the reaction, it must be addressed in the appropriate manner, outlined below.

The different levels of abuse and reporting systems at Enko Education

Layer of Need	Definition	What School Does / Is Doing	If Staff Have Further Concerns, Options Include...
Universal LOW LEVEL	All children are entitled to receive basic support within the school environment. Staff regularly check in with students to ensure that their learning, social, and emotional needs are being met	• Provide standard classroom and pastoral support. • Make reasonable adjustments to meet individual needs. • Record and monitor minor concerns. • Address needs through daily interactions and support.	• Monitor and record patterns of concern. • Discuss with CSL if unsure.- Complete the staff Safeguarding Concern Form if concerns persist.
Team Around the Child LEVEL 1	When a child or family needs extra help beyond what is normally available at school. Staff and parents work together, and additional support may involve internal teams or early help from external services	• Conduct a School-Led Assessment.- Create a Pastoral Support Plan (PSP). • Meet regularly with family and child.- Access school counsellor, psychologist, or wellbeing staff.	• Submit further safeguarding forms to CSL. • Review and update PSP.- Consider involving external services if concerns persist. • Escalate to Level 2 if needed.
Children in Need LEVEL 2	When a child requires coordinated support from the school and external agencies (e.g., social care, health professionals) to maintain their health, safety, or development.	• Work jointly with agencies (social care, health, etc.).- Obtain parental consent for joint working. • Ensure the child's voice is heard. • Review PSP regularly and record progress.	• Escalate to Child Protection (Level 3) if risk increases. • Maintain regular communication with agencies. • Keep detailed documentation of all actions.
Child Protection LEVEL 3	When a child is at risk of significant harm or has already been harmed. Immediate action is required, including referral to social care and/or the police within 24 hours.	• Immediate referral to social care and/or police. • Do not delay action to seek advice. • Record the child's voice clearly. • Seek parental consent only if safe.	• Report to CSL immediately. • CSL must contact authorities within 24 hours. • Seek guidance from the Group Safeguarding Manager if unsure.

The different levels of abuse and reporting systems at Enko Education



Incident	Owner	Veto	Influencer	Contributor	Actions
Universal	CS Lead	HoS	Head of Department/ Academic Coordinator	HoS	Everyone: Staff concern form
Team Around the Child (TAC) LEVEL 1	CS Lead	HoS	Head of Department/ Academic Coordinator	HoS	Everyone: Staff concern form CS Lead: Pastoral support plan
Child In Need (CIN) LEVEL 2	CS Lead	HoS	CS Manager	External agencies	Everyone: Staff concern form CS Lead: Pastoral support plan Incident report
Child Protection (CP) LEVEL 3	CS Lead and HOS	HoS	CS Manager	External agencies	Everyone: Staff Concern form CS Lead: Pastoral support plan Incident report CS Manager to CEO CEO to BoD

The different levels of abuse and reporting systems at Enko Education



Reporting systems

An allegation can be made against an employee or volunteer at any point. It is important that any such allegations are treated seriously, and appropriate procedures followed.

An allegation is different to a complaint and can be defined as follows:

- Where someone has behaved in a way that has harmed or may have harmed a child.
- Where someone has possibly committed a criminal offence against a child.
- Where someone has behaved in a way towards a child or children that would pose a risk to children.

All reports must be made within 24 hours.

If you are a school staff member

- If you have a concern about a student:
  - Complete a paper Safeguarding Concern Form.
  - Hand-deliver it directly to the Child Safeguarding Lead in your school.
- The CS Lead will review, record, and take appropriate action in line with safeguarding procedures.

If you are a Child Safeguarding Lead

- For Level 2 (Children in Need) and Level 3 (Child Protection) cases:
  - Report the case to the Group Safeguarding manager using the online reporting form.
- Ensure that:
  - All actions and outcomes are logged and dated.
  - Ongoing communication with the Groupe Safeguarding manager is maintained.

If you are a central team member

You have two ways to report safeguarding concerns:

1. **In-school** | Use the paper Safeguarding Concern Form and hand it to the school's CS Lead.
2. **Remotely** | Use the online reporting form to notify the Group Safeguarding Manager directly.

The different levels of abuse and reporting systems at Enko Education



If the concern involves a member of staff

- The Group Safeguarding Manager must be notified immediately.
- The Group Safeguarding manager will involve Human Resources (HR) to ensure appropriate investigation and follow-up.
- All actions must remain confidential, following safeguarding and employment procedures.
- Employees will reduce the possibility of an allegation being made by ensuring that they are aware of the expectations within the code of conduct for employees and volunteers and the guidance for safe working practice, this includes school Intimate Care policies.

If the concern involves a safeguarding or leadership role

Person Concerned	Who to contact?
Child Safeguarding Lead	their line manager and the group safeguarding manager
Head of School (HoS)	the group safeguarding manager
Group Safeguarding Manager	HR and their direct manager
Central Team Member	The group safeguarding manager

If the concern is of Level 3 or reputational nature

- All Level 3 incidents (Child Protection) and any incident with reputational impact will be immediately reported by the Group Safeguarding Manager to the CEO of Enko Education.
- The CEO will in turn report the matter to the Board of Directors.

Key principles

- *Record all concerns with clarity, accuracy, and confidentiality.*
- *Report through the correct channel without delay.*
- *Respond immediately where a child is at risk of harm.*
- *Respect the privacy of all individuals involved and share information only on a need-to-know basis.*

The different levels of abuse and reporting systems at Enko Education



If the concern involves an employee's child

- **Fair treatment** | Children of staff must be treated equally to all other students. They are not VIPs, nor should they be used as leverage or for retaliation.
- **Reporting** | All cases involving an employee that are classified as level 2 or above, or situations where an employee decides to withdraw their child from the school, must also be reported by the Group Safeguarding Manager to the School Sponsor in addition to the CEO. Employees are expected to promote the network positively.
- **Avoid any conflict of interest** | If a staff member has concerns about their child, it is essential to discuss it :
  - **Stage 1** | **Informal resolution (line manager)** Speak to line manager and see if the matter can be quickly and easily resolved
  - **Stage 2** | **Formal resolution (HoS)** If the situation cannot be resolved informally, then it should be escalated to the HoS as a formal complaint. HoS will deal with the situation in a formal manner, taking statements and interviewing stakeholders. Sponsor and HR are informed.
  - **Stage 3** | **Formal appeal (Sponsor/HR**). If there is no satisfactory outcome from Stage 2, then the matter will need to be escalated to the Sponsor and HR.

If the concern involves the child of an Enko partner

- **Fair treatment** Children of partners must be treated equally to all other students. They are not VIPs, nor should they be used as leverage or for retaliation.
- **Reporting** Child safeguarding leads are not necessarily aware of who is and who is not a child. It is up to the HoS to liaise with the CS manager then the CS manager inform the CEO

At the school level it is the Child safeguarding Lead (with the HoS in the loop) who decides who need to be involved in a case resolution. At the central level it is the Group Safeguarding Manager who decides who needs to be involved in a case resolution.

The different levels of abuse and reporting systems at Enko Education



Disclosure, reporting and further action

If a child asks to speak to someone in confidence about a problem, no one should ever promise confidentiality if what the child discloses or is likely to disclose relates to abuse being suffered by them or another child. Employees should always give this as a health warning before meeting with the child.

The following guidance is based on five key practices for all employees:

1. **Receive** | Where possible always stop and listen to a child who wishes to speak in confidence. We know that children will often find the most inconvenient time to do this, but it is important that you make time for the child, even if this is to say, "I can't stop now but come and see me in my office at….". Where possible during any disclosure try to listen, allow silences, and try not to show shock or disbelief.
2. **Reassure** | Try to stay calm, make no judgments and empathise with the child. Never make a promise you can't keep. Give as much reassurance as you can and tell the child what your actions are going to be. Reassure the child that they are doing the right thing by telling you.
3. **React** | React to what the child is saying only as far as you need to for further information. Don't ask leading questions. Keep questions open such as: "is there anything else you need to tell me?". Try not to criticise the alleged perpetrator as this may be a family member for whom the child may still have feelings.
4. **Record** | Make brief notes about what the child says during the conversation, but if this is not possible, make notes as soon after as you can and certainly within 24 hours. Make sure to record exactly what the child says and not your interpretation of what is said. Record the time, date, and place as well (see the record of concern form).
5. **Report** | Where a child makes any disclosure, or where you have concerns for any reason, it is very important that the procedures outlined in this document are followed. A full written/typed account of the concern (ideally using the record of concern form) should be passed to the Child Safeguarding Lead as soon as possible and should include, where relevant, a completed body map.

The different levels of abuse and reporting systems at Enko Education



Where a child has made a disclosure and alleges abuse, the Child Safeguarding Lead (or Head of School in the absence of the CSL), should be informed as soon as possible. The Child Safeguarding Lead will collate any available evidence by ensuring the notes taken from any witnesses are made available to any investigating body. The Child Safeguarding Lead will then consider and where necessary, consult on the information available. It is the role of the Child Safeguarding Lead to make decisions about what action to take next and to make the decision whether to take the matter further within the local legal framework. It is important that a full record of all the information and decisions made are recorded and stored confidentially.

Enko Education recognises the diverse and complex local contexts our schools operate in. Therefore, the following principles are taken into account when following the framework and procedure for disclosure, reporting and further action:

As international schools we:

- often reside in cities and countries that offer little external support.
- recognise the limitations in the areas of child protection.
- need to assess the quality and skills of counsellors and other support staff in dealing with children who have suffered harm or self-harm, in order to determine the boundaries of their work.
- need to act in accordance with local legislation as well as the principles and practices outlined in this policy.

Local safeguarding agencies/advice

Each school must have local arrangements and contact details for local agencies and bodies who can both advise or accept referrals. Schools are free to produce a separate document that outlines which, if any, agencies are contactable or available for the school to seek advice from or make referrals to.

Record Keeping and Confidentiality



Record Keeping

All records of child protection concerns, disclosures or allegations should be treated as sensitive information and should be kept together securely and separately from the child's general school records. The information should be shared with all those who need to have it, whether to enable them to take appropriate steps to safeguard the child, or to enable them to carry out their own duties, but it should not be shared more widely than that.

- Files should be accessible through the Child Safeguarding Lead (or their deputy) and other senior employees in larger schools to ensure reasonable access.
- Records of any child disclosure should be clearly dated and filed without future amendment.
- Child protection records should be separate to the general education file, but the child's general school record file should be marked to indicate that a child protection file exists (e.g., red star or similar). All employees who may need to consult a child's school file should be made aware of what the symbol means and who to consult if they see this symbol.
- A child protection file should be started for an individual child as soon as the school is aware of any child protection concerns about that child. This may arise in a number of ways e.g.:
  - If an employee raises a concern about the welfare or well-being of a child – this should be recorded in writing.
  - If information is forwarded to the school by a previous school attended by the child.
  - If the school is alerted by another agency of child protection concerns about that child.
- Employees should make a written account of any concern they have regarding the welfare or well-being of a child, using the schools pro forma. This record should be passed as soon as possible to the Child Safeguarding Lead. Concerns, which initially seem trivial, may turn out to be vital pieces of information later. So, it is important to give as much detail as possible. A concern raised may not progress further than a conversation with the Child Safeguarding Lead but could also potentially lead to matters being dealt with through a legal system. If there hasn't been a specific incident that causes concern, try to be specific about what it is that is making you feel worried.
- If any information is removed from a file for any reason, a dated note should be placed in the file indicating who has taken it, why and when.

Record Keeping and Confidentiality



In the case of disclosure, remember the record you make should include:

- As full an account as possible of what the child said (in their own words).
- An account of the questions put to the child.
- Time and place of disclosure.
- Who was present at the time of the disclosure.
- The demeanour of the child, where the child was taken and where returned to at the end of the disclosure.

Confidentiality

Schools should regard all information relating to individual Safeguarding/child protection issues as confidential and should treat it accordingly. Information should be passed on to appropriate persons only at the discretion of the Child Safeguarding Lead and this should always be based on the need to know.

All records relating to child protection should be secured appropriately.

Record Keeping and Confidentiality

English & Français & Portuguese

Concern form / Formulaire de préoccupation / Formulário de reclamação

Name(s) of students
Please add the Student(s) who are the subject of this concern and add any other student(s) you want associated to it, include Year group(s) / class(es) if known
Nom(s) de l'élève / des élèves
Veuillez indiquer le ou les élèves concernés par cette préoccupation, ainsi que tout autre élève que vous souhaitez associer à ce signalement. Merci d'ajouter la classe ou le niveau (si connu).
Nome(s) do(s) aluno(s)
Indique o(s) aluno(s) em questão, bem como qualquer outro aluno que deseje associar a esta denúncia. Adicione a turma ou o ano (se souber).

Details of concern
No need to repeat concern summary but provide fuller detail of concern (including location of incident)
Détails de la préoccupation
Inutile de répéter le résumé, mais veuillez fournir des informations plus détaillées sur la situation (y compris le lieu de l'incident, s'il est connu).
Detalhes da preocupação
Não é necessário repetir o resumo, mas forneça informações mais detalhadas sobre a situação (incluindo o local do incidente, se conhecido).

Concern date/time I Date / heure de la préoccupation I Data/hora da preocupação
DD/MM/YYYY - HHMM I JJ/MM/AAAA - HHMM I DD/MM/AAAA - HHMM

Who wrote the concern
E.g Teacher, Parent, Police, other student
Auteur du signalement
Par exemple : Enseignant, Parent, Police, autre élève
Autor da denúncia
Por exemplo: Professor, Pai/Mãe, Polícia, outro aluno

Received by Child Safeguarding Lead: Signature and date
Reçu par le/la Responsable de la protection de l'enfance : Signature et date

Recebido pelo(a) Responsável pela Proteção Infantil: Assinatura e data

The record pro forma should include :

- [ ] A record of the child's details: name, date of birth, address, and family details.
- [ ] Date and time of the event/concern.
- [ ] The nature of the concern raised.
- [ ] The action taken and by whom: Name and position of the person making the record.



E-safety

The growth in electronic media in everyday life and an ever-developing variety of devices create additional risks for children. Risks and dangers of being online include:

- Inappropriate content.
- Ignoring age restrictions and communicating with unknown adults or other children (which make children vulnerable to bullying and grooming).
- Grooming and sexual abuse.
- Sharing personal information.
- Gambling or running up debts.
- Cyber Bullying.

Cyber bullying is an increasingly common form of bullying behaviour and is most often related to social networks and mobile phones.

Enko Education believes the best way to protect our students is to teach awareness and understanding of risk, particularly through personal, social and health education, sex and relationship education or wellness programmes. Enko schools must find appropriate and frequent opportunities to teach learners how to recognise when they and others are at risk and equips them with the skills, strategies, and language they need to take appropriate action.

E-Safety Policy_Safeguarding_2025



Mobile phone and Camera Images

It is our policy that practitioners, teachers, and visitors should not use personal mobile phones to take images of children. In our primary and secondary schools, if personal equipment is used to capture child images, these images should be uploaded to the schools' system as soon as possible and immediately deleted from personal equipment. This measures must be completed before an employee leaves the school premises at the end of a school day. Permission to capture images, videos or audio recordings should be sought from the Child Safeguarding Lead or HoS for the school.

At the beginning of school events parents should be reminded of the restriction of taking photos and videos on school site and that they must not take images of any child other than their own.



Publication of school activities on digital platforms

We are aware that the use of digital platforms and social media in particular can make children particularly vulnerable to 'grooming'. Therefore, all Enko Education employees will ensure that when promoting school activity on these platforms they adhere to the following measures:

- Always asking for written consent from parents or carers before taking and using a child's image.
- Always explaining what images will be used for and what potential risks are associated with sharing images of children.
- Making it clear that if a child or their family withdraw consent for an image to be shared, it may not be possible to delete images that have already been shared or published.
- Changing the names of children whose images are being used in school published material whenever possible (and only using first names if we do need to identify them).
- Never showing screen shots of video conferencing lessons or meetings that show children's faces and full names.
- Only using images of children in appropriate clothing.
- Avoiding full face and body shots of children taking part in activities such as swimming.
- Never publishing personal information about individual children and disguising any identifying information.
- Making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information).
- Reducing the risk of images being copied and used inappropriately by using correct settings on digital platforms.
- Visitors and parents/carers should be asked not to use mobiles devices within the school and/or early years setting, except where permission has been granted to capture images of their own child or children. All parents/carers must give permission for photographs to be used for publicity purposes and to sign a disclaimer if they do not wish their child's image to be used externally.



Children with Special Educational Needs or Disabilities

All employees should recognise that children with Special Educational Needs and Disabilities can mean additional safeguarding challenges. Depending on the nature of a child's special need or disability, additional barriers can exist which make it more difficult to identify and recognise signs of abuse.

For example, it is easy to assume that a child's mood, behaviour, or any injury relates to their disability rather than the fact they may be suffering abuse. It should also be recognised that children with disabilities may be more proportionately impacted on by behaviours such as bullying but they may not show any outward signs. Communication difficulties can make it very difficult for a child to indicate what's happening and, therefore, may make it very difficult to overcome any such barrier. Employees should be extra vigilant and report all concerns, avoiding making assumptions about the causes of any injury or behaviour.

Physical Intervention/restraint

There may be times when adults in schools, in the course of their school duties, have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention should always be both reasonable and proportionate to the circumstances and be the minimum necessary to resolve the situation. The Head of School should require any adult involved in any such incident to report the matter to him/her as soon as possible. The employee is required to document the incident in full giving a description and full account of the incident. Witnesses to the incident should be identified where possible.

Where intervention has been required a senior employee should be asked to debrief the student and allow them to describe the incident from their point of view. Written notes of this conversation should be kept, and the student checked for any injuries.

Parents/carers should always be informed when an intervention has been necessary.

Physical Intervention Policy

Preventative measures and linked policies for safeguarding children



Safer recruitment and selection

We will do all we can to ensure that all those working with children in our regions and schools and across our whole group are suitable people. In order to do this, all employees who will work in an unsupervised capacity with children or young people will be recruited using safer recruitment procedures.

Safer Recruitment involves scrutinising applicants through the interview process and application forms, verifying identity, qualifications and obtaining appropriate references, undertaking criminal background checks from all countries where the applicant has lived or worked in the last 10 years, as well as some additional recruitment checks.

At least one member of every interview panel at both the organisational and school level, who are interviewing for a post or posts that may have unsupervised contact with children, will have undertaken safe recruitment training. All schools will keep a central record of all the recruitment checks undertaken on all employees.

Safer recruitment claim

Safer recruitment guide for manager

Whistleblowing

We recognise that we cannot expect children to raise concerns in an environment where adults fail to do so. All employees and volunteers should be aware of their duty to raise concerns about the actions or attitude of colleagues. Appropriate concerns raised for the right reasons are considered to be a protected disclosure and, even if proven to be unfounded, no action will be taken against the whistle-blower.

Malicious whistleblowing, however, will be seen as a potential disciplinary matter.

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