

COMPANY POLICIES AND PROCEDURES

Page	Policy
2	Explore Learning Aims and Objectives
3	Equal Opportunities Policy
4	Disability, Special Educational and Additional Needs Policy
5	Safeguarding Policy and Procedures inc. Online Safety Policy and Procedures
19	Managing Allegations Against Members of Staff
22	Guidelines for Managing Children
24	Physical Restraint Policy
25	Child Registration, Departure, Non-Collection, Lost Child, Sick Child, Access and Centre Capacity Procedures (centre specific)
28	Health and Safety and Environmental Policy
32	Infection Control Policy
33	Fire and Evacuation Policies and Procedures (accompanied by Fire Log)
36	Counter Terrorism Policy and Lockdown Procedures
38	Accident Policy (accompanied by Accident Folder)
40	Incident Policy (accompanied by Incident Folder)
41	Storage, Handling and Administration of Medication/Treatment Policy
43	Safe Storage and Management of Confidential Documents and Records Policy
44	Notification of Information to Enforcing Authorities Policy
45	Modern Slavery Policy
46	Safer Recruitment Policy
49	Centre Manager and Tutor Recruitment Procedures
53	Policy for Staff Eligibility to Work in the UK
54	Whistle Blowing Policy
55	Complaints Policy
56	Centre Security Measures and ICT Security Policy and Procedures
60	Privacy Policy
67	Personal Data Breach Procedures

Centre Annual Risk Assessment (centre specific)

EXPLORE LEARNING AIMS AND OBJECTIVES

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

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

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

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

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

We seek parents/guardians and children's feedback from the moment they join us, to help us evaluate our care provision and the quality of tuition that we provide and make improvements that are important to them as individuals. We aim to build a strong partnership with members' parents/guardians and work collaboratively with them to provide the best possible service and support each of our members to become fearless learners.

EXPLORE LEARNING LTD

EQUAL OPPORTUNITIES POLICY

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

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

We are uniquely able to achieve these goals because our method of working treats every child as an individual, and we operate with a high staff ratio.

It is the job of our staff to ensure that the children feel welcomed, and that they all benefit from the service we offer. This includes a high level of individual attention, recognition, celebration of their successes and positive social interactions with staff and other children.

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

Explore Learning staff promote the fundamental British values of R.I.D.E:

- Rule of law
- Individual liberty
- Democracy
- Equality - mutual respect and tolerance of those with different faiths and beliefs.

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

Explore Learning will:

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

DISABILITIES, SPECIAL EDUCATIONAL AND ADDITIONAL NEEDS POLICY

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

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

We ensure that:

- We take time to discuss a child's needs with the parent/guardian and child at the time of registration.
- We will take all reasonable steps to ensure all children have access to the provision.
- All children are included in the social life of the centre and feel 'members' in the full sense of the word, irrespective of ability.
- We regularly review children's progress and adapt their programmes as necessary.
- We make the best possible use of parent/guardian conferences and other opportunities for dialogue and feedback.
- Parents and guardians are welcome to bring interpreters, translators, and educational psychologists to meetings. The manager should be informed prior to the meeting so they know who to expect. Explore Learning do not provide this service or cover the cost.
- Staff are encouraged to be aware of disability issues, special educational and additional needs, and complete SEND training on developing inclusive practice.
- We are always open to guidance from parents/guardians and professionals on the type of training that may be beneficial or necessary for working with a specific child.
- All parents/guardians and children with accessibility needs, if required, can access our centres straight away to ensure that they are free of any encumbrances in the centre.
- Staff will respect the privacy and dignity of all members and staff and ensure this is maintained whilst in our care.
- All information provided by a parent/guardian will remain confidential, and only shared with the minimum necessary members of staff.
- All information provided will be stored securely in the child's personal file and on their individual record on our membership database.
- We work within the guidelines of the Disability Discrimination Act 1995, and for members in Northern Ireland, the Equality Act 2010.

SAFEGUARDING POLICY AND PROCEDURES

1. Purpose of regulation: To inform parents/guardians of Explore Learning's policies and responsibilities concerning safeguarding and to stress the importance of communication.
2. Purpose of regulation: To inform staff of their responsibilities when working with children.

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

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

Explore Learning recognises that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The centre setting may be the only stable, secure and predictable element in the lives of children at risk. During a session, their behaviour may be challenging and defiant, or they may be withdrawn. The setting will endeavour to support the member through:

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

INTRODUCTION

A child is defined as a person under the age of 18 (The Children Act 1989). For the purpose of this policy document:

- The term 'child' will be used to describe all children and young people under the age of 18 years old participating as a member at Explore Learning.
- The term 'staff' will be used to describe those employed on a contract of employment at Explore Learning, including those working on a voluntary or temporary basis.
- Staff should implement this policy using the following guidelines when conducting work that involves children. This will protect the safety and wellbeing of children engaging with Explore Learning and that of our own staff.
- For all activity and events involving children at Explore Learning, at least one member of staff should lead on safeguarding, raising awareness of this policy and its guidelines among other staff and, where appropriate children and parents/guardians.
- Where staff engage with a child on a one-to-one basis, it is imperative that he/she is appropriately trained in safeguarding.

Children's Rights

All children have needs and rights:

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

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

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

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

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

A troubled child or young person will need to be reassured that their needs are being put first, not being put second fiddle to other concerns. The staff member is in a unique position in terms of sympathetic environment and of trust.

Suitability and Nature of Physical Environment (In Centre Membership)

The layout of the activity, premises and sites have been considered in terms of a child’s safety, including from a safeguarding viewpoint. A Risk Assessment is conducted annually in consideration of physical risks, as well as a daily check to maintain standards within the setting.

Explore Learning Safeguarding Policy

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

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

Policy Statement

Explore Learning staff have a professional duty to take such steps that are reasonable to see that the child is safe from harm whilst involved in Explore Learning activities. All children have a right to protection, and the needs of disabled children and others who may be particularly vulnerable must be considered. Explore Learning will ensure the safety and protection of all children involved in its activities through adherence to the safeguarding guidelines it has adopted.

Policy Aims

The aim of the Explore Learning Safeguarding Policy is to promote good practice:

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

Policy Implementation

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

The guidelines cover three main areas:

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

Staff Recruitment, Support and Training

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

1. Suitability questions at interview.
2. All staff complete a suitability self-declaration.
3. A suitable Enhanced DBS/PVG check every five years.
4. Two dated references requesting details of their previous experience and suitability to work with children. Where available, one must be from their most recent employer.
5. A record of staff's current and history of physical and mental health.

Staff Training covers:

1. Induction training in Health and Safety, Fire Safety, Safeguarding including Online Safeguarding, Behaviour Management, and the 'Common Core Skills and Knowledge of the Children's Workforce'.
2. All staff to read the Explore Learning Safeguarding Policy & Procedures annually, available on the company intranet 'the bubble'.
3. Safeguarding training modules refreshed annually and record on staff training records.
4. Awareness of The Prevent Duty, recognising the signs and symptoms that a child may be at risk from radicalisation, how to protect children from terrorism or extremism, and where to report concerns.
5. Awareness of Female Genital Mutilation (FGM) to cover an understanding of key issues, risk factors, high risk absences, symptoms, long term health problems, legislation and how to share information to ensure a person at risk of FGM is referred to the appropriate support.
6. Awareness of safeguarding issues will continue to be addressed through on-going training, guides and workshops.

The company Senior Designated Safeguarding Officer has undertaken Advanced Safeguarding Training, Role of DSL and The Prevent Duty awareness training, and is able to provide advice and support to other members of staff on protecting children from the risk of abuse or radicalisation.

Staff Conduct

All staff should demonstrate exemplary behaviour in accordance with the Code of Conduct and in order that they can protect themselves from allegations of misconduct. Staff should maintain their standards of behaviour, therefore acting as a role model. The following are common sense examples of how to create a positive culture and climate for learning:

Good practice means:

Within Explore Learning Centres

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets). Never allow yourself to be left alone with a member. There may be rare occasions when a confidential one-to-one meeting is necessary and, in such circumstances, the meeting should be conducted in a room with an open door or visual access. Where this is not possible, the member of staff should ensure that there is another adult nearby.
- Maintain a safe and appropriate distance from children e.g. it is not appropriate for staff to have an intimate relationship with a child.
- Avoid all physical contact with a member at all times. Avoid picking them up, cuddles or allowing children to sit on your lap etc. There may be occasions where a distressed member needs comfort which may include physical comforting; staff should use their discretion to ensure that it is appropriate and not unnecessary or unjustified contact.
- Never using physical force against a member, unless it constitutes reasonable restraint to protect him/her or another person, or to protect property. Refer to 'Physical Restraint Policy' for more guidance.
- Never use physical punishment.
- Secure parental/guardian consent in writing if the need arises to administer emergency first aid and/or other medical treatment. First aid given should be recorded in writing and reported to the lead member of staff who will inform the parent/guardian.
- Keep a written record of any injury that occurs, along with the details of any treatment given.
- Stop and question any unknown adult who enters the premises and/or who attempts to engage with the children.

Both in Centre and Online through Explore at Home

- Treat all children equally, and with respect and dignity. Explore Learning will take positive action to eliminate discrimination against any person or group of people. Staff should ensure that children are protected from discrimination on any grounds, including ability and challenge discriminating comments and behaviour. Staff should promote positive attitudes towards differences.
- Never contradict an instruction given by a tutor/manager or other member of staff.
- Building balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Conducting yourself in a manner that sets a good example to the participants. Be an excellent role model – this includes not smoking or drinking alcohol or the discussion of this in the company of /whilst responsible for children.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Always refer any problems or concerns to the safeguarding lead member of staff.
- Set Social Media settings to private so children and families cannot look staff up/contact them.
- Dress appropriately according to Company Dress Code.

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

- Children's inappropriate use of language and/or behaviour. This should always be challenged.¹
- Do things of a personal nature for children or disabled adults that they can do for themselves.²
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Engaging in any form of inappropriate touching, including pinching or slapping.
- Making sexually suggestive comments towards a child or parent/guardian.
- Reducing a child to tears as a form of control.
- The threat of corporal punishment.
- Being under the influence of drugs or alcohol whilst responsible for children or smoking in front of a child.
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon.
- Discuss personal matters about staff or the child.

- Discuss inappropriate topics including subjects such as relationships, sex or illegal activities. Conversation should be solely about their session or welfare.
- Share personal contact details including: contact numbers, address or social media links.
- Arrange to contact or meet a child outside of an authorised session in person or online whether professionally or personally.
- Committing any act that brings the reputation of the company into disrepute.
- Taking a personal phone call when working with a child.
- Taking or sharing a photo or screenshot of children/their families.
- Taking a voice or video recording for any purpose without written permission from parent/guardian before recording commences, using Explore Learning's online permission form.
- Storing photos, videos or recordings on a personal device.

¹Challenging behaviour: 'Bad' behaviour is often a response to a situation, or a way to seek attention. If children are occupied, there will be less of a need to seek attention and less of a chance for boredom to set in.

The following guidelines can be used to deal with challenging behaviour constructively:

- Be aware of what unacceptable behaviour is. Ask your lead member of staff if you are unsure.
- Explain to children why certain behaviour is unacceptable. This makes children feel responsible for their behaviour and they are less likely to repeat it.
- Make sure it is the behaviour that is punished and not the person. Always avoid labelling someone as 'bad'.
- If appropriate, ignore the bad behaviour for a while – a child may only be attention seeking. Give extra attention and praise for positive behaviour to discourage 'bad' behaviour.

² It may be sometimes necessary for staff to do things of a personal nature for children, particularly if they are young or disabled. These tasks should be carried out with the full understanding and consent of the parents/guardians. There is a need to be responsive to a person's reactions. If a person is fully dependant on you, talk with him/her about what you are doing and give choices where possible – particularly if you are involved in dressing or undressing of outer clothing, or where there is physical contact, lifting, or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks which you are not appropriately trained.

Use of photographic/filming equipment

If Explore Learning wishes to use an image or recording of a member, written consent will be obtained in advance from parents/guardians via an online form. Parents/guardians will be made aware of when, where and how the images may be used in order to give their informed consent. This includes information regarding use of images e.g. in print, multimedia, broadcast; for what purpose e.g. promotion, publicity, evaluation, audit, review; and where possible an indication of who the audience will be e.g. the general public, the participating children and their families, other organisations and institutions. Explore Learning will never disclose the full name or other personal details of the child without the parent/guardian's separate written consent.

Parents/guardians are not permitted to take photographs or videos unless it is of their own child, and no other children feature in the background.

Use of Mobile Phones

Staff are not permitted to use personal mobile phones whilst working with a child, either in centre or online. These should be switched off or silent during working hours. Personal mobile phones and other personal devices must never be used to take or store images or recordings of any children. Explore Learning cannot accept liability for the loss or damage of personal property kept in centre.

Children and Visitors are not permitted to use mobile phones within the centre unless under supervision in an emergency or to ensure and communicate a child's safety such as if they arrived or intend to leave alone.

E-security

Within Explore Learning Centres

Children have supervised access to computers throughout the centre.

Strict controls are placed on access to websites.

Explore Learning has a centralised Fortinet sensory managed fire wall, which has a limited profile preventing access

to unsuitable sites or images.

Fire walls are regularly updated by the IT team.

When Tutoring Online via Explore at Home

If staff are using a personal device for company purposes, we recommend that they ensure that they are using Windows 10/Mac OSX and apply the security updates when made available for these systems. In addition to the built-in endpoint protection present with Windows Defender and MAC OSX, we also recommend using third party antivirus tools as an added safety net.

If a member of staff leaves the organisation, all company linked tools are removed from the personal device prior to leaving their role.

No sensitive company data is stored locally on personal devices.

No images or recordings of children are taken or stored on any personal device.

SAFEGUARDING PROCEDURES

Explore Learning follows the procedures set out by local multi-agency Safeguarding Partners and takes account of guidance issued by the Department for Education and Skills to ensure:

1. Children's attendance for sessions both in centre and online is recorded on our company membership database; electronically signed in and out on arrival and departure.
2. All staff, visitors, parents/guardians who step through the centre gate must sign in and out with their full name and the time, so everyone is accounted for at all times for both fire and safeguarding regulations. Records must be written in pen for permanency.
3. Visitors to the centre, including parents/guardians, must always be supervised by a fully trained and vetted staff member.
4. Staff with a criminal conviction or pending criminal investigation, in relation to children or sexual assault, will not be allowed to work, or granted access to the centre.
5. The Centre Director of each centre / Service Delivery Manager of each virtual centre has received appropriate training and support to take on the role as Designated Safeguarding Officer for their members, family and staff team.
6. The Head of Ofsted & Safeguarding is the nominated Senior Designated Safeguarding Officer.
7. Every member of staff (including temporary) know the names and roles of the staff responsible for safeguarding.
8. All staff understand their responsibilities in being alert to the signs and symptoms of abuse, and for referring any concerns to the designated senior person responsible for safeguarding.
9. That parents/guardians understand the responsibility placed on the setting and staff for safeguarding, by setting out its obligations in the settings Policies & Procedures.
10. Explore Learning Staff develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters, including attendance at case conferences.
11. Keep written records of concerns about children, even where there is no need to refer the matter immediately.
12. Develop and then follow procedures where an allegation is made against a member of staff.
13. Ensure all safeguarding incidents are reported centrally to the Senior Designated Safeguarding Officer (Head of Ofsted & Safeguarding) to be recorded on the Company's Central Incident Record file.
14. Ensure safe recruitment practices are always followed.

ONLINE SAFETY POLICY AND PROCEDURES

Policy Statement

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

Policy Aims

The purpose of this policy is to:

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

We believe that:

- children and young people should never experience abuse of any kind
- children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times

We recognise that:

- the online world provides everyone with many opportunities; however it can also present risks and challenges
- we have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- we have a responsibility to help keep children safe online, whether or not they are using Explore Learning's network, devices and approved platforms for online tuition
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety

Responsibilities

Tutoring Staff will:

- ensure they are punctual and ready to begin sessions on time so that children are not unsupervised online. Repeated lateness will not be tolerated and may lead to disciplinary action or dismissal
- blank or blur their background and ensure that their environment does not display any personal or inappropriate information or imagery that could be viewed by the member and supervising adult
- only permit enrolled members with pre-booked sessions into online learning platforms. Attempted unauthorised access will be reported as an incident and appropriate action will be taken
- remain vigilant, ensure no one else is present/visible in their own or the child's environment who shouldn't be
- never discuss personal matters or share personal details including contact information with children or their families. Communications will be made by Managers only via official Explore channels
- never arrange to meet up with members or their families and ensure that contact is appropriate to their role as a Tutor
- encourage sensible use of online platforms and consider the potential dangers and the age appropriateness of

- resources shared in sessions
- monitor member internet use closely when tutoring and report the use of any other sites/platforms visited as appropriate
- always end a session immediately if a child does or says anything inappropriate
- alert a Manager immediately during a session of any unusual activity or concerns about a child or another member of staff in accordance with company Safeguarding Procedures
- remain vigilant at all times and communicate any concerns regarding child supervision immediately to the Manager in charge of coordinating sessions who will take the appropriate action
- follow and adhere to all aspects of company Use of Own Device Policy

Managers will:

- complete Online Safeguarding e-learning training to support them in their role as Manager of online sessions
- ensure tutoring staff are trained appropriately in Online Safeguarding so they are confident in their role with keeping children safe during their sessions
- ensure the suitability of any tutoring staff before allowing them to work with members and their families
- respond to any concerns of safeguarding, behaviour and wellbeing reported from all participants urgently and following the appropriate company procedure
- moderate online sessions by having the ability to observe sessions at any time to ensure that tutoring is in line with expectations
- ensure that all parties participating in online sessions are treated with equal respect and dignity
- support members and families in keeping safe when using online platforms for learning and direct parents/guardians to suitable e-safety guidance and resources
- follow and adhere to all aspects of company Use of Own Device Policy

Parents/Guardians agree to:

- consent to their child's participation in online 1:1 and/or group sessions through enrolment to Explore Learning
- support their children to participate appropriately and safely, to mitigate the risks associated with online learning. Parents are guided to online safety resources via the FAQs section of the Explore Learning website and are advised to add appropriate child locks/filters and check/clear the internet browsing history as required
- support children in understanding that comments posted online will be seen by others and cannot be edited/deleted, which can become part of their digital footprint
- always be responsible for the welfare of their child whilst undertaking online sessions, monitoring their use of other sites and platforms alongside their learning with Explore
- ensure their child is undertaking sessions in a safe and suitable environment, and is dressed appropriately and ready to learn
- never share links/invitations to Explore Learning online sessions with anyone else
- report any concerns they have regarding their child's participation in online sessions with Explore Learning staff
- ensure children under 8 and those with additional medical or educational needs are supervised during their sessions by a responsible adult, aged over 16
- remain nearby for the duration of the session - to be available for session feedback at the end and respond to concerns or emergencies throughout
- treat Explore Learning staff with fairness and respect at all times and ensure that members also adhere to this
- report any inappropriate or illegal behaviour by other members in group sessions or staff to a Manager or centrally to Explore Learning Head Office immediately, in accordance with this policy
- only respond to communications via official Explore Learning channels using their own email accounts (not child's), and report any concerns of unauthorised contact from Tutoring staff to Management urgently
- understand that any child/family member behaving disruptively during an online session, including making inappropriate comments or gestures, will be removed from the call immediately and appropriate action will be taken in line with our Safeguarding and Guidelines for Managing Children Policies. Behaviour such as threats or harassment of others, hate speech, threats of violence and posting personal information will not be tolerated
- support their child in understanding their responsibilities during online sessions as outlined below

Explore Learning Members must:

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

Online Safeguarding Procedures

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

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

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

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

Where staff are concerned that a child may be vulnerable to or experiencing online abuse, they must follow company Safeguarding Procedures and report urgently to Head of Ofsted and Safeguarding, who can support in escalating to the relevant authorities and organisations.

In the event that a crime has been committed or a child is in immediate danger, call 999.

To report someone behaving suspiciously online towards a child, contact CEOP – Child Exploitation and Online Protection Command

<https://www.ceop.police.uk/ceop-reporting/>

To report criminal content relating to child sexual abuse, contact IWF - Internet Watch Foundation

<https://report.iwf.org.uk/en>

SAFEGUARDING DISCLOSURES

What is abuse?

CHILD ABUSE: A term to describe a range of ways in which people, usually adults, harm children. Often the adult is a person who is known and trusted by the child.

CHILD ABUSE IS PHYSICAL INJURY, EMOTIONAL, NEGLECT OR SEXUAL ABUSE (PENS) inflicted or knowingly not prevented, which cause significant harm or death.

NSPCC (1999)

Awareness of actual or likely occurrence of abuse

There are several ways in which abuse can become apparent:

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

Issues of Disclosure

Becoming aware of abuse can cause a multitude of emotional reactions, which are personal to each individual. Whatever the reaction and however the abuse has become apparent, actual or suspected, it must be reported in the correct manner according to the procedure outlined in this document. Even if the truth of the disclosure is uncertain – an appropriate response must be made.

A response in accordance with the procedure outlined here will be supported by the lead member of staff and ultimately Explore Learning.

Responsibility

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

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

What to do upon suspicion or disclosure of abuse

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

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

Reporting suspected, alleged, or actual incidents of abuse

It may sometimes be difficult to accept that something has been disclosed in confidence by a child or anyone else. But the welfare of a child must be paramount, and you therefore have a duty to report suspicions, allegations or actual incidents to the designated member of staff. Information should be reported if you have concerns that a child may be suffering harm or at risk from abuse, even if you are unsure about your suspicions.

Once this initial report has been made, the lead member of staff will consult with the relevant statutory agencies within 24 hours, or immediately if the child is in immediate danger. You may or may not be required to discuss your concern/disclosure with the parent/guardian if they are the alleged abuser, or if concerned that by sharing the report with them could put the child at risk from harm, according to your local Children's Social Care procedures. Where this is not a concern and the parent/guardian is not the named abuser, then ensure they are informed straight away.

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

In Centre: Your local contacts are displayed on the Emergency Numbers Poster in the centre's office.

Online Learning: You can search online for local authority contacts to report a child concern.

These include:

Local Children's Social Care Safeguarding Team & Out of Hours Emergency Duty Team
Safeguarding Partners / MASH - Multi Agency Safeguarding Hub
NSPCC Child Protection Help Line
Emergency Services / Police Non-Emergency

The following information may be required:

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

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

Statutory safeguarding procedures

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

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

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

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

Recording suspected or actual incidents

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

- The date and time of disclosure, suspicion, allegation or actual abuse incident.
- Details given to you about the above, e.g. date and time of when things occurred.
- Any indication of the parties involved.
- Details of the action that you and the setting have taken.
- Details of reporting on, e.g. who to (statutory agency) and when.
- Signature of staff reporting
- Signature of witnesses (if applicable)
- Signature of parent/guardian if permitted to inform – we would not seek a signature from a parent/guardian if a disclosure was made directly about them.

If for any reason it is decided not to consult with a relevant statutory agency, a full explanation of why must be documented.

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

Electronic record forms should be used for reporting. Centre teams should file completed forms in their Incident Folders, online teams will share these with Head of Ofsted and Safeguarding for secure electronic storage.

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

Incidents should be reported to the Head Office Designated Safeguarding Officer (Head of Ofsted & Safeguarding) to be recorded on the company's Central Incident Record file. Reports must be deleted from laptops or other devices for data protection purposes once shared.

This policy will be reviewed annually.

Emergency Safeguarding Contact Numbers

These numbers are displayed in the office notice board and the Company Intranet Safeguarding page.

Explore Learning Head of Ofsted & Safeguarding (Senior Designated Safeguarding Officer, SDSO) or Deputy Designated Safeguarding Officer (DDSO)

Explore Learning Central Safeguarding Line: 01483 447412

The Designated Safeguarding Officers (DSO) for each setting are:

In Centre - Centre Director or Assistant Director in their absence

Online - Service Delivery Manager

Emergency Services:	999
Local Police:	101
NSPCC Contact Point 24/7:	0808 800500
Childline:	0800 1111 www.childline.org.uk
Radicalisation Concern Helpline:	020 7340 7264
Anti Terrorist Hotline:	0800 789 321

Children's Social Care Referral /MASH (Normal Hours) within 24 hours or immediately if child at risk:

Children's Social Care (Out of Hours Emergency Duty Team):

Safeguarding Allegations against staff - Local Authority Designated Officer (LADO) within 24 hours:

LOCAL CHILDREN'S SOCIAL CARE / MASH DETAILS FOR ONLINE MEMBERS CAN BE FOUND BY CONDUCTING A WEB SEARCH.

Important – you must contact the local authority for the borough in which the child lives.

Ofsted (England) within 14 days: 0300 123 1231

EXPLORE LEARNING LTD

MANAGING ALLEGATIONS AGAINST MEMBERS OF STAFF

Policy Introduction

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

Allegations and complaints against staff can be minimised by having:

- Safer Recruitment strategies in place
- Appropriate induction and regular safeguarding training
- Open and transparent safeguarding ethos including the discussion of common issues
- Professional code of conduct

Allegation Definition

In accordance with Working Together to Safeguard Children (2018), an allegation is any information which indicates that a volunteer or member of staff who works with children has:

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

Immediate Action

If a member of staff is suspected, alleged or has actually abused a child, the staff member would be suspended from work immediately and the event fully investigated, as outlined below. If the concerns are about a member of the management team, Explore Learning's Head of Ofsted & Safeguarding should be contacted.

Where there is an immediate threat to a child, the Police or the Emergency Children's Social Care Team (if outside office hours) must be contacted.

Procedure

When an allegation is received, management staff will:

- Stay calm and provide a safe, private environment to discuss the allegation
- Take the matter seriously
- Take the time to give their full attention; listen, hear, be supportive
- Establish the facts and clarify the situation/circumstances

- Make a written record of the allegation using the informant's words (including time, date and place where the alleged incident took place, what was said and anyone else present)

A report, detailing as much information as possible would be made within 24 hours to:

1. Explore Learning's Head of Ofsted & Safeguarding, who would also notify Ofsted within 14 days
2. Explore Learning HR Team
3. Local multi-agency Safeguarding Partners within 24 hours; in England - **specifically the Local Authority Designated Officer (LADO)**. The LADO, or equivalent in Scotland/Wales/Northern Ireland, will provide advice and guidance on how to manage the allegation and check staff have taken all appropriate steps

The Role of the LADO

The LADO is responsible for the oversight of allegations against adults working in the local authority, liaising with a range of agencies and ensuring such matters are dealt with consistently and in a timely fashion. The initial discussion with the LADO will consider the nature of allegation and the course of action.

Actions to be agreed with the LADO:

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

Possible outcomes of the initial discussion:

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

In the case of NFA, staff at the centre should then liaise with the HR team and Explore Learning's Head of Ofsted & Safeguarding to decide how to proceed further, which may include internal disciplinary action.

Supporting Those Involved

The person(s) who makes the allegation and their parents/guardians:

Parents/guardians will be notified if their child makes or is involved in an allegation against staff if they do not already know. However, if the police or Children's Social Care are to be involved, they will be contacted first and will advise as to what information may or may not be disclosed to the parents/guardians. Parents/guardians will be made aware of any progress in the investigation, and the outcome will be explained to them.

The employee:

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

Outcome of Allegations

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

Substantiated: There is sufficient evidence to prove the allegation.

False: There is sufficient evidence to disprove the allegation.

Unsubstantiated: This is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation.

Malicious: There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

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

Record Keeping

In all cases, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached must be recorded. This should be kept in the confidential staff file of the accused, and a copy provided to the person concerned with the allegation. The record should be retained until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

EXPLORE LEARNING LTD

GUIDELINES FOR MANAGING CHILDREN

These guidelines are to be followed by ALL members of staff to ensure that children behave in an appropriate manner.

The Centre Director / Service Delivery Manager has specific Behaviour Management responsibility; by title this is part of their job description. In their absence, Behaviour Management is the responsibility of the Manager on duty.

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

Explore Learning Centres

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

If a child's behaviour is such that they are deemed to be 'out of control' (i.e. causing excessive harm to other children, staff or property), the Centre Director, Assistant Director or On-Call Supervisor reserves the right to telephone the parent/guardian and ask them to remove the child.

Explore at Home

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

Where relevant to the setting, Explore Learning staff will:

- Always remain positive when dealing with a child – praise and encourage them, make them feel good about what they're doing and help them to see achievement rather than failure.
- Take the time to listen to children and record any problems they are having.
- Speak quietly and calmly to the child, and speak with the child at their own level, even when encountering difficulties with that child.
- Whilst every effort should be made to prevent such situations arising, a member of staff may restrain a child using the minimum and appropriate amount of force. This could be if a child is running around the centre or behaving physically in an inappropriate manner which may harm the welfare of others. Staff will lead them to a seat, sit them down and discuss the situation calmly. Restraint should only be used if it is the only practical means of securing the welfare of the child or preventing harm to others. Refer to 'Physical Restraint Policy' for more guidance.
- Where a child is being difficult, and must be reprimanded, ensure they understand their behaviour is not appropriate. Help them understand that by being disruptive they are spoiling not only their own, but other children's experiences and that this is unfair. Help older children to see that they need to lead by example. Encourage them to take a mature attitude, deciding independently how to behave themselves, rather than

having to be told by a member of staff. In virtual group sessions it may be necessary to arrange a meeting with a parent/guardian present, outside of a group session to discuss this.

- If a child uses inappropriate language, make it clear that this is not accepted as it can upset and offend other staff and children.
- Where a child is bullying, or being mean to another child, deal with the situation immediately making it clear that such behaviour is unacceptable. Manage the situation so that the bully and the child being bullied are dealt with appropriately as two separate individuals; give support to both. Explain that Explore Learning is a place where children have the opportunity to come and have fun, make new friends and work together, not a place to be unpleasant to others.
- Where a child is getting stressed or upset with their learning, help them to see their achievement in terms of the long-term rather than the immediate.
- Where a child is destructive towards the equipment or facilities at Explore Learning, make it clear that such behaviour is inappropriate and disrespectful.
- Staff are not permitted to physically chastise members or use the threat of corporal punishment as a means of controlling behaviour.
- Staff may use behaviour agreement contracts and concentration charts with a member, alongside parents/guardians to monitor and improve their behaviour.
- In some instances where a child's behaviour is continually disruptive to others' membership at the centre and cannot be managed effectively using the above guidelines, they may be asked to leave either temporarily or indefinitely.

Serious incidents that involve injuries to the child, another person, including children or staff must be written up in an Incident Report and reported centrally to Head Office. Electronic record forms should be used for reporting and shared with confidentiality.

EXPLORE LEARNING LTD

PHYSICAL RESTRAINT POLICY

Definitions

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

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

Policy Aims:

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

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

Use of Restraint

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

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

Staff at Explore Learning will only ever use restraint:

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

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

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

Restraint should only be used if it is the only practical means of securing the welfare of the child. Explore Learning staff will never use physical punishment or threat of physical punishment.

EXPLORE LEARNING LTD

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

Registration Procedure

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

Once registration is completed, the member of staff will let the child into the centre through the gate, ensuring it has been closed behind them, take the child to their learning zone and equip the child with the necessary materials for their session. The staff member will notify the parent/guardian what time to collect their child, and then they should leave the centre.

If the parent/guardian is not present, the above procedure should be followed in regard to the child and staff.

Departure Procedure

Upon enrolment of their child, the parent/guardian is required to provide details of anyone who is authorised to collect their child at the end of their session. **Only individuals aged 16 or over are permitted to act as pick-up person for a child.** If the parent/guardian does not provide any names, then only that parent/guardian will be allowed to collect the child. They may only give permission for their child to be allowed to leave independently if the child is aged 8 years or over as per Ofsted requirements. This still applies to children leaving the centre for a break between a double session. Parents/guardians should understand that Explore Learning can take no responsibility for children leaving or arriving unaccompanied.

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

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

If there is a police or court order in place to prevent visitation/contact of a child by a parent/guardian, the family are required to inform the management team, and provide evidence to prevent an incident occurring where a child could be released into the care of a person who was previously allowed contact.

If a couple divorces and a parent/guardian does not want their ex-partner or their new partner to have access to the child, they would need to notify the management team so they could change the pick-up arrangement records. Only the parent/guardian who originally enrolled the child/ren and is listed as the primary contact on our membership database has the right to change this.

Children leaving unaccompanied should leave before or at the end of a maximum stay of 1.5 hours. On leaving the centre, the child will be electronically signed out on the company membership database.

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

Child Non - Collection Procedure

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

Centre in a Supermarket/Shopping Centre:

- If the parent/guardian is known to be in store, and staff: child ratios permit, a member of staff should check the store in search of the parent/guardian. The child must remain in the centre with a DBS/PVG cleared over 18 member of staff.
- If the parent/guardian cannot be located in-store, request a tannoy announcement from the Customer Services Desk, asking that them come to Explore Learning.
- If this fails, or the parent/guardian is not in-store, phone them, or a person on the pick-up permission list.
- If the parent/guardian or any permitted pick-up contacts cannot be contacted, telephone the **Children's Social Care**, who are trained to support the child and help them cope with their vulnerable position. They may direct staff to contact the Police.

Stand Alone Centre:

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

Lost Child Procedure

In the instance of a finding that a child within our care is missing and unaccounted for, actions should be taken in the following sequence, until the child is located:

- Immediately inform the Centre Director and other staff members.
- Conduct a thorough search of the centre. Check that the child has not been signed out/collected by someone else.
- Where applicable, inform Sainsburys/Tesco/shopping centre staff at the Customer Services Desk and request a tannoy announcement, requesting that the child and parent/guardian come into the Centre.
- If the child has not been found once the centre and store has been searched, telephone the parent/guardian.
- If the parent/guardian confirms that they do not know the location of the child, telephone **the Police immediately on 999**.
- Complete an Incident Report.
- Report to Explore Learning's Head of Ofsted & Safeguarding who will support the centre team investigate and review what measures could have been taken to prevent the incident.

Sick Child Policy and Procedure

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

- In an emergency, our staff may administer necessary emergency advice or treatment to your child/ren. Staff will attempt to contact you in the event of an accident or emergency, but if we are unable to do so, we will need to take the necessary action.
- Please do not bring your child to the centre if he/she is ill or infectious. Staff will adhere to guidelines from <https://www.nhs.uk/Livewell/Yourchildatschool/Pages/Illness.aspx>, stating that children should not attend sessions:
 - For 24 hours after they begin to feel better from a cold, cough sore throat or raised temperature
 - For 48 hours after symptoms of vomiting and diarrhoea have ceased
 - Until all chickenpox spots have crusted over

In the instance of a child becoming ill whilst in Explore Learning's care, actions should be taken in the following sequence:

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

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

Access and Supervision

Staff and all visitors must sign in and out with the time when entering and leaving the centre in our Staff and Visitor Log. This is to safeguard our members and for use as a register in an emergency centre evacuation.

Staff under the age of 18, and all visitors, must be supervised within the centre at all times by a member of staff aged 18 or over who holds an enhanced DBS/PVG check.

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

Animals and Pets

Animals are not permitted in our centres except registered assistance dogs.

Centre Capacity Policy

Explore Learning maintains a capacity limit of _____ children within the centre at any one time.

Should a situation arise whereby admitting further children would exceed these limitations, we reserve the right to not admit these children. In this situation, we would reserve a place by completing a session note ready for them and request that parents/guardians return after a short period of time. If a child arrives alone, they should be brought into the centre for safety and the parent/guardian contacted.

For further information on the temporary reduction of capacity within our centres owing to COVID-19, see the latest version of Explore Learning Ltd Reopening Post Lockdown Risk Assessment.

EXPLORE LEARNING LTD

COMPANY HEALTH AND SAFETY POLICY STATEMENT

Based upon Health and Safety at Work Act 1974

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

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

Explore Learning Ltd. Statement of General Policy is to:

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

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

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

BILL MILLS, CEO.

EXPLORE LEARNING LTD

ENVIRONMENTAL POLICY STATEMENT

This is the Environmental Policy Statement of Explore Learning Ltd.

Explore Learning recognises the importance of environmental issues and throughout its commercial and societal activities and operations is committed to fostering the preservation and protection of the environment. Explore Learning is also committed to continually improving its environmental performance.

It is the policy of Explore Learning to:

- Minimise the extent of environmental impacts on operations within the organisations sphere of influence
- Conserve energy through minimising consumption and maximising efficiency
- Minimise the use of materials, which may be harmful to the environment
- Promote efficient purchasing, which will both minimise waste and allow materials to be recycled where appropriate
- Put in place procedures and support information that enables compliance with the law, regulations and codes of practice relating to the environmental issues
- Recognise and encourage the contribution every employee can make towards improving environmental performance

HEALTH AND SAFETY POLICIES AND PROCEDURES

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

Responsibilities

1. Overall responsibility for Health and Safety is that of the CEO.
2. The day-to-day responsibility of ensuring this policy is put into practice is delegated to the Centre Director.
3. In the absence of Centre Director, day-to-day responsibility will be delegated to either of the Assistant Directors or On-Call Supervisor.
4. All employees are personally responsible for health and safety within the Centre and should:
 - a. Co-operate with the Centre Director/Assistant Directors/ On-Call Supervisor on health and safety matters.
 - b. Take reasonable care of their own health and safety and that of the children in their care.
 - c. Not interfere with anything provided to safeguard their health and safety and that of the children in their care.
 - d. Report any concerns over health and safety to the Centre Director.

Health and Safety Risks Assessments

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

Safe Plant and Equipment

1. The Centre Director will be responsible for identifying all equipment needing maintenance.
2. The appropriate head of department will be responsible for ensuring effective maintenance procedures are drawn up.
3. The Centre Director will be responsible for ensuring all identified maintenance is implemented.
4. Any problems found with equipment should be reported to the Centre Director.
5. The purchaser will check that any new equipment meets health and safety standards before it is purchased.

Safe handling, storage and use of substances

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

Information, Instruction and Supervision

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

Health and Safety training

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

Accidents & First Aid

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

Monitoring

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

Emergency Procedures

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

No Smoking Policy

Smoking is forbidden anywhere on, or in close proximity to, the centre premises. It is the responsibility of the Centre Director to ensure that suitable signage is visible to the public, and that staff are aware of the company policy.

Reporting

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

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INFECTION CONTROL POLICY

Explore Learning aims to promote the general wellbeing and health of all children and to ensure that the risk of infection is minimised amongst all children and staff.

We ensure that:

- All parents/guardians sign an agreement on registering that states they will not bring their children to the centre if they are unwell or infectious. If they have not attended school that day, they should not access the centre.
- Staff do not come into work if they are unwell and will inform management if they are feeling unwell during a shift.
- All incubation periods for illnesses are checked by staff through NHS Direct and using exclusion guidelines for schools.
- Good hygiene practice signs are displayed within the centre.
- Antibacterial hand gel is available on reception, and staff encourage visitors to use as they enter the centre.
- All bins contain bin liners.
- All staff actively encourage the children to regularly wash their hands to maintain good hygiene practice.
- Antibacterial soap and hand driers are provided in the toilet facilities.
- Tissues are provided in all areas of the centre.
- A water fountain or water dispenser with individual disposable cups are used for drinking water.
- Staff ensure the centre is cleaned daily; and equipment which is used by children on a regular basis is cleaned appropriately.
- During periods when children are present on site, visitors and staff are not allowed to bring food or animals into the centre, unless they require an assistance dog.
- Staff notify parents/guardians and Ofsted if there is spread of infection in the centre amongst children or staff.
- In the event of having to dispose of clinical waste, we would consult the Environment Agency to comply with correct guidelines.

Serious incidents must be written up in an Incident Report and reported centrally to Explore Learning's Head of Ofsted & Safeguarding. Electronic record forms should be used for reporting and shared with confidentiality.

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FIRE AND EVACUATION POLICIES & PROCEDURES

Management Responsibilities

It is the Centre Director's overall responsibility to:

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

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

Staff Training

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

Fire Risk Assessment

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

Equipment

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

- Member attendance records and Staff & Visitors Sign in/out Logs
- CO2 and Hydro Spray Fire Extinguishers
- Emergency Exit signs
- Emergency Evacuation posters
- Fire Log
- First Aid box

Notification of Procedures to Parents/Guardians and Children

Parents/guardians receive the evacuation procedures in the event of a fire in the Membership Handbook.

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

Staff Ratios

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

Evacuation Exits and Routes

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

Assisting Children or Staff in a Centre Evacuation

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

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

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

Emergency Evacuation Procedures

IF YOU DISCOVER A FIRE

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

CALL THE FIRE BRIGADE

ON HEARING THE ALERT ALARM i.e. intermittent alarm

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

EVACUATION PROCEDURE

- Children:** Stay calm
Listen to your tutor
Stay with your tutor and follow their instructions
Evacuate via your nearest fire exit to the fire assembly point
- Tutors:** Evacuate children through the nearest fire exit in an orderly fashion
Take responsibility for the children in your area
Escort children to the fire assembly point
Do not let children leave unaccompanied
- Manager:** Collect centre iPad to access company membership database for records of children in attendance, Member and Staff/Visitor Attendance Registers and a phone. Conduct full and final check of premises to ensure empty i.e. toilet, storage rooms, Surf Club and proceed to fire assembly point

AT FIRE ASSEMBLY POINT

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

COUNTER TERRORISM POLICY AND LOCKDOWN PROCEDURES

Policy Statement

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

Management Responsibilities

It is the Centre Director's overall responsibility to:

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

Making a Referral

Explore Learning's Head of Ofsted & Safeguarding, as the Senior Designated Safeguarding Officer will advise and act upon all suspicion, belief and evidence of all reported cases of radicalisation.

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

Measures Taken to Aid the Prevention of Radicalisation

Staff Checks

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

Information Security

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

Centre Security Measures

- External doors should not be propped open.
- If a staff member loses their keys or security alarm fob, the Facilities Manager must be informed immediately.
- Centre staff in stand-alone settings are trained how and when to use or reset their panic alarms which are linked to the Police.
- Centre staff in Sainsburys/Tesco/shopping centre based settings are familiar with their store security team, and how to contact them in the event of a concern or emergency.

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

Suspicious Mail or Deliveries

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

Suspicious Items

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

Bomb Threat

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

Lockdown Procedures

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

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

Incidents must be written up in an Incident Report and reported centrally to Explore Learning's Head of Ofsted & Safeguarding. Electronic record forms should be used for reporting and shared with confidentiality.

EXPLORE LEARNING LTD

ACCIDENT POLICY

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

Pre Existing Injuries

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

Accidents on the Premises

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

Each Explore Learning Centre has a First Aider, First Aid Box and Accident Record Folder.

Where an accident takes place within an Explore Learning centre, the following procedure will take place:

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

Where an accident takes place within an Explore Learning centre, it will be reported on an electronic (editable PDF) Accident Record and stored in the Accident Folder. The following will be recorded:

7. date, time and location of accident occurrence
8. name of the person(s) injured.
9. name(s) of the staff reporting the accident.
10. circumstances of the accident: type of accident, how it happened and what furniture/equipment/people were involved.
11. a description of any injury sustained (type, size and location on the body). A note should also be made if no visible injury or wound is visible.
12. what actions were taken and by whom e.g. First Aid administered, ambulance called etc
13. the signature of 2 members of staff, the First Aider and a witness to the event.
14. the signature of the parent/guardian collecting the child or of the adult to whom the accident happened.

A copy of the accident report should be given to the parent/guardian of the child involved or to the adult to whom the accident happened.

If a child has had an accident and has permission to leave the centre by themselves and is not being collected by a parent/guardian, the Centre Director, Assistant Director or On-Call Supervisor in charge will telephone the parent/guardian and notify them of the accident, explaining that it has been recorded in the Accident Record Folder. The staff member should make sure the parent/guardian signs the record confirming they have been notified the next time they come into the centre. If the child has been involved in an accident, and the staff do not feel it is appropriate for the child to leave on their own, they will call the parent/guardian and ask them to collect the child.

Serious Accidents or those requiring hospitalisation must be written up and reported centrally to Explore Learning's Facilities Manager. Electronic record forms should be used for reporting and shared with confidentiality. Explore Learning's Facilities Manager is responsible for reporting accidents, diseases and dangerous occurrences (RIDDOR) to HSE, the Head of Ofsted and Safeguarding will notify the enforcing authority, Ofsted.

INCIDENT POLICY

Explore Learning has a commitment to the safety and wellbeing of children under the care of Explore Learning staff. Our Incident Policy is designed to protect the children, staff, parents/guardians of Explore Learning and visitors to our centres and ensure that any incident is dealt with appropriately. This policy works in conjunction with our Behaviour Management and Accident Policies.

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

- a child behaves inappropriately
- it is necessary to restrain a child physically due to severe or dangerous behaviour
- an individual attempts to or actually causes deliberate harm to another person
- an individual abuses verbally, or in writing, another person
- a child attempts to escape from the premises or actually escapes from the premises
- a child is removed without authorisation from the centre
- any type of safeguarding incident or concern occurring in centre, outside or online
- individuals are discriminated against on the basis of their race, colour, nationality, culture, language or religion
- staff code of conduct is breached
- theft, burglary or vandalism
- centre closure

This above list is not exhaustive – refer to the Incident Folder for further examples of what should be recorded.

Where an incident takes, the situation will be recorded on an electronic Incident Record Form and stored securely on the centralised server or within the centre Incident Folder. The following details will be recorded:

1. date, time and location the incident happened
2. child's full name, age and address
3. full name of the member(s) of staff or others involved and their role
4. an account of the incident by a member of staff, any children involved, and any witnesses
5. how the incident was handled
6. the outcome of the investigation
7. the signature of two members of staff (the member of staff involved and another as a witness)
8. the signature of the parent/guardian (as long as the allegation is not regarding them)
9. whether the incident required reporting to Children's Social Care/LADO or enforcing authorities such as Ofsted, and the Police.

Staff will notify the parents/guardians of the children involved in the incident after the session, or telephone them immediately, depending on the severity of the incident. **If staff feel that a child may be at additional risk from harm, they may not share this information with the parent/guardian, and instead contact the relevant external authority for advice and guidance on how best to escalate a concern.** Explore Learning staff will review the child's behaviour with the parent/guardian and the child and agree the best course of action. Explore Learning reserves the right to exclude a child from sessions or an Explore Learning centre at any time.

If the incident cannot be reported to the parent/guardian immediately, a Manager will telephone them to notify them of the incident and that it has been recorded. Serious incidents must be written up in an Incident Report and reported centrally to Explore Learning's Head of Ofsted & Safeguarding. Electronic record forms should be used for reporting and shared with confidentiality.

EXPLORE LEARNING LTD

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

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

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

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

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

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

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

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

Explore Learning will:

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

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

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

Serious incidents and accidents must be written up in an Incident or Accident Report and reported centrally to Explore Learning's Head of Ofsted & Safeguarding. Electronic record forms should be used for reporting and shared with confidentiality.

POLICY FOR THE SAFE STORAGE AND MANAGEMENT OF CONFIDENTIAL DOCUMENTS AND RECORDS

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

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

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

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

- A daily record of the names of the children undertaking sessions both online and in centre and their booking times
- Staff files
- Complaint records

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

- Accidents which involve the children being cared for occurring on the premises where childcare is provided.
- Incidents which involve the children being cared for occurring on the premises, or during online sessions, to include disclosures and allegations made by children or concerns about a child's welfare or safety.
- Any medicine administered to any child who is cared for on the premises, including the date and circumstances and who administered it, including medicine which the child is permitted to self-administer, together with a record of a parent/guardian's consent.

Children's Records:

- All children's records comply with the Children Act 1989 Regulations.
- An electronic record will be kept on the membership database.
- Are openly shared with the child's parent/guardian and their contribution is valued.

In the event of a centre closing, all records are sent to a secure storage unit within Explore Learning Head Office or another centre and kept for the appropriate period of time as described above.

In the event of Explore Learning Ltd as a company ceasing to operate, all records and documentation will become the responsibility of the CEO. He will maintain the secure storage of the above records and documentation for the appropriate length of time. All electronic data will be stored in accordance with the GDPR.

While Explore Learning staff share records and information concerning a child and their family, this information is private and therefore treated with strict confidentiality. On joining Explore Learning Ltd all employees sign a contract of employment and agree to keep all information about a child and their family, other employees and the Company strictly confidential.

Ofsted have the right to inspect our records at any point.

POLICY FOR THE NOTIFICATION OF INFORMATION TO ENFORCING AUTHORITIES

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

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

- A change to the address or registration details of the premises where childcare is provided.
- A change in the type of childcare we provide.
- Any change of the Managers or Nominated Person.
- Any change of the Managers or Nominated Person's name, address or telephone number.
- Any significant event which is likely to affect the Managers or Nominated Person's suitability or any person caring for children on the premises, such as any offences or orders that may disqualify them.
- Any incident of food poisoning affecting two or more children in the provider's care.
- Any serious accident or injury to, or the death of any child while receiving childcare.
- Any serious accident or injury to, or the death of, any other person on the premises on which childcare is provided.
- Any allegation of serious harm to, or abuse of, a child committed by any person looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or by any person, where the allegation relates to harm or abuse occurring on those premises.
- Updated for 2020 – any confirmed case of COVID-19 at the premises where childcare is provided. Ofsted must be notified if a setting has to close as a result.

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

EXPLORE LEARNING LTD
MODERN SLAVERY POLICY

Slavery and Human Trafficking Policy Statement

Explore Learning has a zero-tolerance approach to any form of mistreatment of people and is committed to operating and conducting its business in such a way that human rights are respected and protected. We will not permit or condone any form of slavery, servitude, forced or compulsory labour or human trafficking. We recognise that our business has a role to play in managing this issue and we are firmly committed to working to identify and eradicate modern slavery practices from our operations and our supply chains, to the extent that they exist.

Recruitment

We operate a robust recruitment and employment process. We embrace principles supportive of equal treatment without discrimination and with the protection of employment law for all staff. We treat all staff equally, without discrimination and with respect for their human rights. All staff enjoy the protection of relevant UK law in respect of their employment. Whilst in the main Explore Learning Ltd runs its recruitment process internally, where we use external partners we select approved recruitment partners. Approved partners are reviewed on a regular basis. This policy can be read in line with our staff Recruitment processes.

Due diligence processes for slavery and human trafficking

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

EXPLORE LEARNING LTD

SAFER RECRUITMENT POLICY

Introduction

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

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

Purpose

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

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

1. Recruitment Training

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

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

2. Recruitment procedures

2.1 Recruitment adverts include a role description including the qualities and standards required in the successful candidate, and details of the checking procedures to be carried out.

2.2 An application form and CV are required, and carefully scrutinised. Shortlisting includes checking for qualifications, experience and skills relevant to the job role.

2.3 Recorded video assessments are used for all roles that involve time working with children. These provide a further opportunity to assess candidate suitability prior to final stage interviews.

2.4 Hiring decisions are carried out by a minimum of 2 trained staff members, at different stages of the recruitment process. An interviewer must declare if he or she knows the applicant prior to interview.

2.5 Interviews include identity checks, strengths-based questions and safeguarding scenarios relevant to the role.

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

2.7 Where an individual application form has raised particular questions e.g. employment gaps or spent convictions, these must be satisfactorily explored in the interview.

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

2.9 With the candidate's permission, application forms, work history, qualification data where relevant and certified copies of original identity documents are securely retained on file for each individual during their time working with the organisation and for a period of three years following their employment.

3. Verification

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

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

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

3.4 Two dated references requesting details of their previous experience and suitability to work with children are required. Where available, one must be from their most recent employer.

3.5 Identity documentation checks are carried out for all recruits.

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

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

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

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

3.10 All DBS/PVG information is recorded on our central system 'SelectHR'.

3.11 Any Positive Disclosure information revealed is referred to a director and made subject to a thorough assessment before a recruitment decision is made.

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

4. Probation

4.1 Staff are subject to a probationary period as a term of their contract. This is either 3 or 6 months, depending on the role.

5. Staff training

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

5.2 All staff receive training and written guidelines on safer working practices.

5.3 All staff receive training and written guidelines on reporting procedures if they suspect that a child or young person is at risk of harm.

5.4 All staff receive training and written guidelines on managing allegations against members of staff/whistle-blowing.

6. Working with third party service providers

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

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

MANAGER RECRUITMENT PROCESS

Candidate Requirements

Managers are hired as Assistant Directors, who are trained and developed to become Centre Directors. We look for all candidates to be strong in our 7 core competencies:

- **Passion** – a strong desire to grow the business, to make a meaningful impact, our people are inspirational, ambitious and goal-orientated.
- **Communication** – everyone here is energetic, warm, positive, articulate, adaptable, credible and empathetic with fantastic interpersonal skills.
- **Receptiveness** – always seeking feedback, strong self-reflection is crucial to recognise their own strengths and areas for development.
- **Leadership** – developing into strong people managers and taking responsibility means they should be confident, driven, assertive, decisive and demonstrate strong self-belief.
- **Resilience** – when juggling multiple responsibilities resilience is crucial to deal with setbacks and problem solve any pinch points that staff may encounter.
- **Initiative** – we love nothing more than a can do go get them attitude, we really look for gumption, in absolute bucket loads!
- **Teamwork** – one of our fundamental values is Family, this means embracing the collaborative elements of being in a team, taking shared ownership and a conscientious accountability for work.

The Key Responsibilities of the Centre Director role

Centre Directors effectively manage their centre whilst ensuring that the team reaches targets relating to centre growth, marketing, retention, revenue and centre-controlled costs.

As well as meeting all the requirements and responsibilities for the Tutor role, Managers also have overall responsibility for the quality of sessions that members receive and for building sustained relationships with parents/guardians.

Centre Managers carry out the following duties whilst constantly working towards, and with, the companies Vision and Values:

- Overall responsibility for their centres performance
- The sales process
- Retention of members
- Overall responsibility for operations
- Finance and budget
- Ofsted and Safeguarding
- Incident Management
- Centre maintenance
- Creating a vision for the team
- Setting targets for individuals and groups of staff
- Leading and motivating a team
- Analysing performance

- Managing centre priorities
- Ensure the delivery of excellent customer service
- Training Assistant Directors to become Centre Directors
- Effective time management
- Point of liaison between centre staff and Head Office

The Explore Learning Training Personal Development Programme is dedicated to the development of each and every employee. We recruit only the very best graduates and are committed to training each individual in a wide variety of child welfare, educational and business skills. The Assistant Director Induction Training is provided via an extensive centre-based programme; Training centre-based consolidation training and inter-centre exchanges. Ongoing training is provided throughout a Manager's entire career with Explore Learning.

All staff complete a Training Needs Questionnaire within their Self Declaration Form when they start and have regular appraisals with their Line Manager to review their performance and continually assess their training needs. Records of these reviews are held in their staff file and their training on the training platform Prodeceo. Staff are allowed time away from their daily duties to complete any training they may require.

Application Process

We will assess an individual's suitability through:

1. Vetting questions at their interview,
2. Reviewing qualifications, skills and experience,
3. A self-declaration of their suitability, including their current and history of physical and mental health.

Job offers are made with the contractual agreement that we must receive proof of qualifications, a suitable DBS Enhanced Disclosure/PVG certificate and 2 suitable references, ideally one from their most recent employer, and one that can testify to their suitability to work with children.

TUTOR RECRUITMENT PROCESS

Candidate requirements

We are looking for exceptional people, who fulfil our 7 competencies and:

- Have the ability to bring a child's learning to life
- Are passionate about helping children achieve their potential
- Can relate to, and build a good rapport with children
- Have a strong academic background in English & maths
- Are presentable, reliable and possess excellent communication skills
- Can work well in a team and help to generate a positive, fun and exciting atmosphere

Job Description: Explore Tutors

At Explore Learning, you will be working as part of a team and we encourage everyone to help in generating a positive, fun and exciting atmosphere where children will love to learn.

Specific duties include:

- Help children with maths and English using engaging teaching methods.
- Effectively tutor up to 6 children at a time, ensuring every child gets equal time, attention and quality of teaching.
- Inspire and motivate our members and pass on a genuine enthusiasm for learning, so that they become excited by learning, and adopt a have-a-go attitude to trickier tasks.
- Provide useful feedback to Centre Managers about notable successes or problems during a child's session; enabling us to give good quality feedback to their parents/guardians.
- Develop a thorough knowledge of the curriculum at Explore Learning.
- Act as a positive role model to all our members.
- Support the management of children's behaviour in a calm and fair manner.
- Be vigilant regarding the welfare and safety of all children and adults in the Centre.
- Assist with administrative and maintenance duties as requested by the Centre's Managerial team.
- Maintain high Health and Safety standards within the centre.
- Contribute to the centres aims to meet Ofsted requirements and standards.
- Treat any knowledge of customers' personal details and the internal affairs of Explore with total confidentiality.
- Publicly represent Explore Learning in the best possible manner through your personal conduct.

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

Application Process

We will assess an individual's suitability through:

1. Vetting questions at their interview,
2. Reviewing qualifications, skills and experience,
3. A self-declaration of their suitability, including their current and history of physical and mental health.

Job offers are made with the contractual agreement that we must receive proof of qualifications, a suitable Enhanced Disclosure/PVG certificate and 2 suitable references, ideally one from their most recent employer, and one that can testify to their suitability to work with children.

POLICY FOR STAFF ELIGIBILITY TO WORK IN THE UK

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

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

DOCUMENT CHECKS

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

- The new staff member must show proof of eligibility to work in the UK with original documents
- The original documents that prove eligibility must be checked with the new staff member present
- Copies of the documents will be held within the staff member's electronic staff file or on the HR system if the employee is a Tutor
- The documents will be checked at the point of interview for every employee
- Any documents that have an expiry date will be rechecked on those dates as required

More information on this policy, including what documents prove eligibility to work in the UK, can be found in Explore Learning's Policy for Identity Checks in Recruitment.

EXPLORE LEARNING LTD

WHISTLE BLOWING POLICY

Explore Learning actively encourages a very open culture within its workplace, which includes a high level of communication between all levels of staff and managers. Explore Learning operates an appraisal system that includes a 360-degree feedback for managers.

If any member of staff is concerned with the working practices of another member of staff, they must report this to their Line Manager as set out in the terms and conditions of their contract of employment. If they are concerned with the working practices of their Line Manager, they should report their concerns to their Regional Manager / Service Performance Manager. They may do this by either telephone or email in the first instance, and at their request a confidential meeting will be arranged. Any member of staff may telephone or email the persons below setting out any concerns that they may have with the working practices of any other member of staff including their managers.

Head Office:	01483 447410
Head of Operations:	Lisa Haycox: lisa@explorellearning.co.uk, or
CEO:	Bill Mills: bill@explorellearning.co.uk
Performance Director:	Richard Hubbert: richard@explorellearning.co.uk
Performance Director:	Louise Johnson: louise@explorellearning.co.uk
Service Performance Manager:	Vanessa Gifford: vanessa.gifford@explorellearning.co.uk
Service Performance Manager:	Kirsty Purdon: kirsty.purdon@explorellearning.co.uk

If you have concerns in connection to safeguarding or regulation, and feel they are not being addressed appropriately you can contact:

Explore Learning’s Head of Ofsted & Safeguarding:	01483 447412
Ofsted Complaints Line:	0300 123 1231
Scottish Social Services Council:	0345 60 30 891
NSPCC Whistleblowing Advice Line:	0800 028 0285

Tutor/Assistant Director/On-Call Supervisor Procedure

Centre Director / Service Delivery Manager Procedure

Bring up concerns with the Centre Director / Service Delivery Manager	Bring up concerns with the Regional Manager / Explore at Home Service Performance Manager
Bring up during bi-annual appraisal (if within a month of initial concerns)	If it is not suitable to speak to the Regional Manager / Service Performance Manager please speak to the Performance Director / Explore at Home Performance Manager
If the appraisal is scheduled more than a month away or if it is not suitable to wait or speak to the Centre Director / Service Delivery Manager, speak directly to the Regional Manager / Service Performance Manager	If you still have concerns or it is not suitable to speak to any of the above staff, please speak directly to: Head of Operations, C.E.O., Head of Ofsted & Safeguarding
If it is not suitable to speak to the Regional Manager / Service Performance Manager please speak to the Performance Director / Explore at Home Performance Manager	If a member of staff is suspected, alleged or actually abused a child , the staff member would be suspended, and the event fully investigated following our Managing Allegations Against Members of Staff Policy and Procedures.
If you still have concerns or it is not suitable to speak to any of the above staff, please speak directly to: Head of Operations, C.E.O., Head of Ofsted & Safeguarding	

EXPLORE LEARNING LTD

COMPLAINTS POLICY

Explore Learning Membership Complaints

Parents/guardians are informed that, should they feel at any time that they have reason for complaint or concern regarding the quality of service provision, in the first instance they should speak to a Manager.

If they are still not satisfied, or if they would prefer not to discuss their concerns with a Manager, we recommend that they contact Explore Learning's Head Office on enquiries@explorellearning.co.uk, who will then be able to investigate the matter and escalate it to the relevant member of staff.

Complaints in Relation to Meeting Ofsted Requirements (England)

1. Any complaint made in writing or made by e-mail that relates to the Requirements of the Voluntary Childcare Register (in England) will be fully investigated.
2. Any complaint will be dealt with in full within 28 days of receipt of the written complaint, including a written response which will include an account of the findings of the investigation and any action taken as a result.
3. Explore Learning keeps a record of complaint (electronic editable form) which includes:
 - the nature of the complaint,
 - the Ofsted requirement it relates to,
 - how the complaint was dealt with,
 - the outcome of the investigation,
 - any action taken, and
 - whether the parent/guardian was given an account of the findings within 28 days of the date on which the complaint was received.
4. Complaint report summaries (data protected) are available to parents/guardians and Ofsted on request.
5. Complaints records are kept for three years, in line with Ofsted requirements.

If the complainant is not happy with the final decision made or wishes to contact Explore Learning's regulatory body before speaking to the management team, they can take their complaint directly to Ofsted / Scottish Social Services Council (SSSC).

Complaints made to Ofsted about a provider may be referred to the provider for investigation.

Ofsted Complaints Line: 0300 123 1231
Scottish Social Services Council: 0345 60 30 891

CENTRE SECURITY MEASURES AND ICT SECURITY POLICY AND PROCEDURES

This document identifies the key elements of Explore Learning's security management systems and the ways in which we seek to improve security for our members, families, staff and visitors who may be affected by centre activities. This document also sets out Explore Learning's Information Security Policies governing protection of the confidentiality, integrity and availability of the computer network and its resources.

It establishes the responsibilities for IT security, preserve integrity of the computer network, protect the computer network and its resources, preserve confidentiality and protect assets against unauthorised disclosure.

Explore Learning staff and members are a key resource and it is essential that risks to their security are properly controlled through an effective security management system and commitment at all levels.

Explore Learning Security Procedures

Responsibilities

The Senior Management Team

- The Senior Management Team will ensure a security measures policy is in place and is monitored and reviewed annually.
- The Senior Management Team will ensure that Explore Learning staff are aware of and adhere to the security measures policy and participate in training where appropriate.

The Centre Staff

Will have delegated responsibility for the day to day security of the Explore Learning centre and for ensuring such things as:

- All staff appreciating the importance of security and understand the security measures policy/procedures and their own responsibilities.
- New staff are informed of the security measures policy/procedure.
- Parents/guardians and attending members are informed of the security measures policy/procedure and encouraged to help ensure that Explore Learning has a safe centre culture.
- Advice will be sought from the police where necessary.
- All crimes will be reported to the police.
- Carry out regular routine security checks within visual risk assessments of the centre, report any maintenance issues of centre security systems and equipment, and raise awareness of security issues.
- All staff considering the sensitivity of the information they handle.
- All staff protecting information in proportion to its sensitivity by ensuring that information, whatever its format, is secured by physical means or by using approved electronic means (laptop/table-pc).

Centre Security Measures

Site Security

Centre managers are responsible for the security of buildings and property.

- External doors should not be propped open.
- If a member of staff loses their keys or security alarm fobs, they should inform the Facilities Manager immediately.
- Centre staff in stand-alone settings are confident on how to and when use or reset their panic alarms, which are linked to the Police.
- Centre staff in Sainsburys/Tesco/shopping centre based settings are familiar with their store security team, and how to contact them in the event of a concern or emergency.
- Centres with rear emergency access have alarms installed to monitor incorrect use of this exit. Alarm panel keys must never be kept in the system, and the alarm must be active at all times.
- At the end of the Explore Learning day each member of staff should ensure that all windows and external doors are securely fastened prior to a check by site staff.
- At the end of the Explore Learning day each member of staff should ensure that the centre office door is securely fastened as an additional security measure. Where possible, external cleaners should not be permitted access to the office.

Contractors

- Contractors on centre site (including cleaning staff) are required to observe the centres security measures policy/procedure.
- Building materials and cleaning equipment must be locked away or kept out of reach of children at all times.
- Centre managers must agree centre access with contractors and cleaning staff, and provide keys, alarm fobs and suitable training on centre security measures where appropriate.

Personal Property

Members are discouraged from bringing valuable items into the centre and in the event that they do so Explore Learning accepts no liability. Staff are responsible for their own personal property.

Money on Site

- Membership at Explore Learning is paid by Direct Debit, Tax Free Childcare or Childcare Voucher monthly payments, meaning that limited cash is stored on site.
- On the occasion that cash payments are taken on site for outstanding membership fees, money is secured until it is banked.

ICT Security Procedures

Network Security

Only Explore Learning employees, using company laptops/tablets and P/C's can connect to the Head Office network. This policy is also the same for all centres in the UK, where the same policy applies. These laptops/tables and P/C's are firstly set-up and managed by the I.T team prior to deployment and use in Head Office and centres.

Computer Security & Monitoring

All staff must abide by the rules of the General Data Protection Regulations 2016 and the Computer Misuse Act 1990.

All resources of the company, including computers, email, and voicemail are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of the company then, at any time and without prior notice, the company maintains the right to examine any systems and inspect and

review all data recorded in those systems. This will be undertaken by authorised staff only. Any information stored on a computer, whether the information is contained on a hard drive, USB pen or in any other manner may be subject to scrutiny by the company.

This examination helps ensure compliance with internal policies and the law. It supports the performance of internal investigations and assists in the management of information systems.

This is a secure storage area which is regularly backed up and is therefore resilient to failure.

Web Security including Intranet (the bubble)

The Head Office environment, all UK wide centres are part of the Zen Internet UK wide MPLS (Multiprotocol Label Switching) network. This enables the company to manage all internet traffic via one breakout point, currently Zen datacentre in Manchester, with failover in Slough Berks, supported via two active firewalls providing content, malware and security-based policy protection.

The bubble is hosted by Orchid Software in conjunction with Microsoft's Azure Platform, also fully secure and redundant.

The internal curriculum and membership systems are fully hosted within the Microsoft Azure platform, and form part of its Platform as a service (PaaS). This is fully secured, and access is controlled centrally and managed through Active Directory.

Wireless Security

All employees who log into the Explore network via access points or more commonly known as WIFI, will be presented with a password prompt. The network is secure and uses industry standard encryption to manage the passwords.

Limited access is available to guests. MAC addresses (media access control) are unique to each machine or mobile device that connects to the network, are also retained for security and monitoring movements around the network.

Email use and Security

Emails sent or received on the hosted email system, Office 365 (Microsoft), form part of the official records of the company. Explore Learning does not recognise any right of employees to impose restrictions on disclosure of emails within the system.

When using emails, employees must: ensure they do not disrupt the wider IT systems or cause an increase for significant resource demand in storage, capacity, speed or system performance e.g. by sending large attachment to a large number of internal recipients (currently set to 25MB), and bring it into disrepute, incur liability on the part company or adversely impact on its image.

Employees must not seek to gain access to restricted areas of the network or other "hacking activities" is strictly forbidden must not use email for the creation, retention or distribution of disruptive or offensive messages, images, materials or software that include offensive or abusive comments about ethnicity or nationality, gender, disabilities, age, sexual orientation, appearance, religious beliefs and practices, political beliefs or social background. Employees who receive emails with this content from other employees, should report the matter to their line manager or supervisor not send email messages that might reasonably be considered by recipients to be bullying, harassing, abusive, malicious, discriminatory, defamatory, and libellous or contain illegal or offensive material, or foul language. not upload, download, use, retain, distribute, or disseminate any images, text, materials, or software which might reasonably be considered indecent, obscene, pornographic, or illegal.

Employees should use their corporate email accounts for correspondence within their role at Explore Learning. They should not try to create forwarding rules to external addresses, if any changes are required to their account they should raise this with the IT Department via a formal support ticket.

Employees must not engage in activities that serve to deny service to other users be outside of the scope of normal work-related duties – for example, unauthorised selling/advertising of goods and services affect or have the potential to affect the performance of damage or overload the company system, network, and/or external communications in any way be a breach of software licence.

Staff who receive improper email from individuals inside or outside the Company, should discuss the matter in the first instance with their line manager or supervisor.

As part of the email security filters, we also utilise Barracuda network security, which scans incoming and outbound emails for viruses, Trojans, and network threats and vulnerabilities.

Passwords

Passwords should not be written down or given to others to use under **any** circumstances, and for individual use only.

Passwords must be a minimum of 8 case sensitive characters and should be a combination of upper/lower/numeric/special characters. Ideally Passwords should also contain random characters such as #@?!\$& etc.

Passwords must be changed every 90 days as a minimum.

If your manager needs access to your computer, for example if you are off sick, they must contact the I.T team to request managerial access to your computer.

Explore Learning complies with Windows Server 2012r2 Password Policy.

Viruses

Bitdefender Endpoint Security anti-virus protection is installed on all laptop/PC/servers throughout the entire Explore networked environment. As part of our current Windows 10 rollout, windows defender is automatically configured, providing real-time threat protection/spyware/viruses/rootkits and other malicious software, updated across Microsoft's Azure cloud data centres.

Telephone & Mobile

All Explore Learning smartphones setup with work email accounts and/or internet-based access to company data must be protected with four-digit security passcode. Mobile phones may not be used to store and/or transmit personal data for which are company sensitive.

Telephones are provided primarily for business use to assist staff in carrying out official company business. Company landlines and mobile phones must not be used for any secondary business purpose.

EXPLORE LEARNING LTD

PRIVACY POLICY

Introduction to our Privacy Policy

Explore Learning is a company registered in England and Wales (registration number 4117281) under the name Explore Learning Ltd; the address of our registered office is **Spaces Station View, Austen House Units A-J, Guildford, Surrey, England, GU1 4AR**. We are registered as a data controller with the Information Commissioner's Office (registration number Z3440439).

Policy Aims

Explore Learning is committed to being transparent about how it collects and uses the personal data of its members and its workforce, and to meeting its data protection obligations. This policy sets out the organisation's commitment to data protection, and individual rights and obligations in relation to personal data.

Explore Learning Ltd. operates "Explore Learning" centres and "Explore at Home" online tuition. This policy concerns both Explore Learning and Explore at Home services.

Explore Learning is committed to complying with data protection legislation and good practice including:

- Processing personal information only where this is strictly necessary for legitimate organisational purposes
- Collecting only the minimum personal information required for these purposes and not processing excessive personal information
- Providing clear information to individuals about how their personal information will be used and by whom
- Only processing relevant and adequate personal information
- Processing personal information fairly and lawfully
- Maintaining an inventory of the categories of personal information processed by Explore Learning
- Keeping personal information accurate and, where necessary, up to date
- Retaining personal information only for as long as is necessary for legal or regulatory reasons or, for legitimate organisational purposes
- Respecting individuals' rights in relation to their personal information, including their right of subject access
- Keeping all personal information secure

Responsibilities under the General Data Protection Regulation (GDPR)

- Explore Learning is a Data Controller and a Data Processor under the GDPR.
- Senior Management and all those in managerial or supervisory roles throughout Explore Learning are responsible for developing and encouraging good information handling practices within the organisation.
- A member of the senior management team is accountable to the Board of Directors for the management of personal information within Explore Learning and for ensuring that compliance with data protection legislation and good practice can be demonstrated.

- Compliance with data protection legislation is the responsibility of all staff at Explore Learning who process personal information.

When you express interest in Explore Learning and book a free trial session, we will collect and process the following data from you:

- your name;
- email address which will be used to send you a confirmation email
- contact telephone numbers which will be used to send you a confirmation SMS and confirmation call
- child's name, age, school and reason for interest in tuition

When you join Explore Learning, we will collect and process the following data from you:

- Parent/Guardian's name, postal and email address, contact phone numbers
- Membership payer's name, postal and email address, contact phone numbers (if not parent/ guardian)
- Emergency contact's names and phone numbers
- Child/ren's name, age, date of birth and school
- Information about any medical conditions, allergies or Special Educational Needs of child/ren
- Details of Direct Debit and debit/credit cards in order for us to accept payment

Members should notify Explore Learning of any changes in circumstances to enable personal records to be updated accordingly.

What can I opt out of?

When you join Explore Learning, you have 2 consent options:

- You have the option of allowing us to use your child's photo for the purpose of promoting Explore Learning during and/or after your membership.
- You have the option of allowing us to share your data with trusted external companies for research, analysis and personalised marketing.

When we share your email address with trusted third-parties for marketing purposes, your data is anonymised, and will only be matched with existing data they hold. You can find out more in our [Cookie Policy](#). If you do not wish to share your email address with third-parties as described above, so that we can show you personalised online adverts, please email: cookieunsubscribe@explorellearning.co.uk

Who will your personal information be shared with?

If we are obliged to disclose personal data by law, or if the disclosure is necessary for purposes of national security, taxation and criminal investigation or to safeguard your child, we will do so. In some circumstances, you may not be notified first.

Your data is hosted on several different systems. All these providers have relevant safeguards in place to protect your data in the same way that we do.

On signing up to our 11+ course as part of your membership, you agree to us sharing your name and home address with a 3rd party organisation, our printing company, in order for your child's course resources to be sent directly to you via Royal Mail, or courier delivery service.

What happens with my data when my membership ends and how is it retained?

- Upon cancellation of membership, your data will be stored safely and securely. We will retain your personal data for a minimum of 2 years and a maximum of 3 years following cancellation of your membership to comply with relevant safeguarding bodies regulations.
- Accident/Incident reports and Administration of Medication records will be kept indefinitely.
- Registers of attendance will be kept for 3 years.

Data protection principles

All processing of personal data must be done in accordance with the following data protection principles of the Regulation, and Explore Learning's policies and procedures are designed to ensure compliance with them. These are:

1. Personal data must be processed lawfully, fairly and transparently

The GDPR introduces the requirement for transparency whereby the controller has transparent and easily accessible policies relating to the processing of personal data and the exercise of individuals' "rights and freedoms". Information must be communicated to the data subject in an intelligible form using clear and plain language.

The specific information that must be provided to the data subject must as a minimum include:

- the contact details of the Data Protection Officer, where applicable
- the purposes of the processing for which the personal data are intended as well as the legal basis for the processing
- the period for which the personal data will be stored
- the existence of the rights to request access, rectification, erasure or to object to the processing
- the categories of personal data concerned
- the recipients or categories of recipients of the personal data, where applicable
- any further information necessary to guarantee fair processing

2. Personal data can only be collected for specified, explicit and legitimate purposes

Data obtained for specified purposes must not be used for a purpose that differs from those formally notified to the Information Commissioner as part of Explore Learning's GDPR registration.

3. Personal data must be adequate, relevant and limited to what is necessary for processing

- The GDPR Owner is responsible for ensuring that information, which is not strictly necessary for the purpose for which it is obtained, is not collected.
- All data collection forms (electronic or paper-based), including data collection requirements in new information systems, must be approved by the GDPR Owner.
- The GDPR Owner will ensure that, on an annual basis all data collection methods are reviewed to ensure that collected data continues to be adequate, relevant and not excessive.

4. Personal data must be accurate and kept up to date

- Data that is kept for a long time must be reviewed and updated as necessary. No data should be kept unless it

is reasonable to assume that it is accurate.

- Members should notify Explore Learning of any changes in circumstance to enable personal records to be updated accordingly.
- It is the responsibility of staff at Explore Learning to ensure that data held by Explore Learning is accurate and up-to-date. Completion of an appropriate registration or application form etc. will be taken as an indication that the data contained therein is accurate at the date of submission.

5. Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing

- Where personal data is retained beyond the processing date, it will be pseudonymised in order to protect the identity of the data subject in the event of a data breach.
- Personal data will be retained in line with the retention of records procedure and, once its retention date is passed, it must be securely destroyed as set out in this procedure.

6. Personal data must be processed in a manner that ensures its security

- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- These controls have been selected on the basis of identified risks to personal data, and the potential for damage or distress to individuals whose data is being processed.
- Personal data shall not be transferred to a country or territory outside the European Union unless that country or territory ensures an adequate level of protection for the 'rights and freedoms' of data subjects in relation to the processing of personal data.
- The transfer of personal data outside of the EU is prohibited unless one or more of the specified safeguards or exceptions apply.

7. Accountability

The GDPR introduces the principle of accountability which states that the controller is not only responsible for ensuring compliance but for demonstrating that each processing operation complies with the requirements of the GDPR.

Specifically, controllers are required to maintain necessary documentation of all processing operations, implement appropriate security measures, perform DPIAs (Data Processing Impact Assessment), comply with requirements for prior notifications, or approval from supervisory authorities and appoint a Data Protection Officer if required.

8. Data subjects' rights

Data subjects have the following rights regarding data processing, and the data that is recorded about them:

- To make subject access requests regarding the nature of information held and to whom it has been disclosed.
- To prevent processing likely to cause damage or distress.
- To prevent processing for purposes of direct marketing.
- To be informed about the mechanics of automated decision-taking process that will significantly affect them.
- Not to have significant decisions that will affect them taken solely by automated process.
- To sue for compensation if they suffer damage by any contravention of the GDPR.
- To take action to rectify, block, erased, including the right to be forgotten, or destroy inaccurate data.
- To request the ICO to assess whether any provision of the GDPR has been contravened.

- The right for personal data to be provided to them in a structured, commonly used and machine-readable format, and the right to have that data transmitted to another controller.
- The right to object to any automated profiling without consent.

9. Right to be forgotten

Data Subjects who wish to exercise their right to be forgotten can request this by contacting enquiries@explorellearning.co.uk. However, due to our Ofsted/Care Inspectorate registration, we are required to keep the following data for 2 years following cancellation of membership:

- The name, home address and date of birth of each member
- The name, home address and telephone number of a parent/guardian/carer of each member
- The right to be forgotten can be exercised after this 2 year period of non- membership. For any Data Subject who did not become a member of Explore Learning, a request for the right to be forgotten will be completed within 30 days.
- A daily record of the names of the children and their hours of attendance will be kept for 3 years.

10. Complaints

Data Subjects who wish to complain to Explore Learning about how their personal information has been processed may lodge their complaint directly by email to enquiries@explorellearning.co.uk. Data subjects may also complain directly to the supervisory authority.

11. Consent

Explore Learning understands ‘consent’ to mean that it has been explicitly and freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she by statement, or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her. The consent of the data subject can be withdrawn at any time.

12. Security of data

All Employees/Staff are responsible for ensuring that any personal data which Explore Learning holds and for which they are responsible, is kept securely and is not under any conditions disclosed to any third party unless that third party has been specifically authorised to receive that information and has entered into a confidentiality agreement. Care must be taken to ensure that PC screens and terminals are not visible except to authorised Employees/Staff. Manual records may not be left where they can be accessed by unauthorised personnel and may not be removed from business premises without explicit authorisation. As soon as manual records are no longer required for day-to-day membership support, they should be archived. Personal data may only be deleted or disposed of in line with the Data Retention Procedure. Manual records that have reached their retention date are to be shredded and disposed of as ‘confidential waste’.

13. Rights of access to data

Data subjects have the right to access any personal data (i.e. data about them) which is held in electronic format and manual records which form part of a relevant filing system.

To obtain a copy of the personal information we hold about you, please email enquiries@explorellearning.co.uk

14. Disclosure of data

Explore Learning must ensure that personal data is not disclosed to unauthorised third parties which includes family members, friends, government bodies. Explore Learning will only disclose and discuss personal data with the Primary contact.

The GDPR permits certain disclosures without consent so long as the information is requested for one or more of the following purposes:

- to safeguard national security
- prevention or detection of crime including the apprehension or prosecution of offenders
- assessment or collection of tax duty
- to protect the vital interests of the individual
- to safeguard our members including contact with local safeguarding boards

All requests to provide data for one of these reasons must be supported by appropriate paperwork.

Cookies

What are cookies?

A cookie is a small data file that is placed and stored on your device (computer, smartphone, tablet etc.) when you visit a website. When you visit explorelearning.co.uk we may automatically collect information that allows us to recognise and remember you through cookies.

How do we use cookies?

We use cookies in a variety of ways:

- Understanding how you use our site
- Analysing our communication with you
- Working with third party companies to serve you relevant advertising on other sites

What types of cookies do we use?

There are three main types that require consent.

(1) Functionality cookies – these allow you to navigate the site and use our features, such as the members' area and 'find a centre' location search.

(2) Analytics or performance cookies – these cookies allow us to measure and analyse how our customers use the site, to improve both its functionality and your experience.

(3) Targeting or advertising cookies – these are used to deliver adverts relevant to you and help us measure the effectiveness of our marketing campaigns.

How to manage cookies

You can manage cookies by changing your browser's cookie settings. These settings are usually found in the 'options' 'help' or 'preferences' menu of your browser.

If you would like to know more visit our [cookie policy](#). This is available on our website.

Updates to this policy

This policy is reviewed frequently and updated on the Explore Learning website. You may therefore want to visit our website regularly to view our most up to date policy.

Contact us

If you would like to contact us about any aspect of this Privacy Policy, please email enquiries@explorellearning.co.uk

EXPLORE LEARNING LTD

PERSONAL DATA BREACH PROCEDURES

This procedure applies in the event of a personal data breach under Article 33 *Notification of a personal data breach to the supervisory authority*, and Article 34 *Communication of a personal data breach to the data subject of the General Data Protection Regulation (GDPR)*.

Procedure – Breach Notification Data Processor to Data Controller

All of Explore Learning's Data Controllers will report any personal data breach to Explore Learning without undue delay and the GDPR Owner will record it on the Internal Breach Register.

Procedure – Breach Notification Data Controller to Supervisory Authority

Explore Learning will notify the supervisory authority of a personal data breach (ICO: Information Commissioner's Office) without undue delay. Explore Learning will assess whether the personal data breach is likely to result in a risk to the rights and freedoms of the data subjects affected by the personal data breach. If a risk to the aforementioned is likely, Explore Learning will report any personal data breach to the ICO without undue delay, and where feasible within 72 hours. Where data breach notification to the supervisory authority is not made within 72 hours, it shall be accompanied by the reasons for the delay.

The data controller shall provide the following information to the supervisory authority:

- A description of the nature of the breach
- The categories of personal data affected
- Approximate number of data subjects affected
- Approximate number of personal data records affected
- Likely consequences of the breach
- Any measures that have been or will be taken to address the breach, including mitigation
- The information relating to the data breach, which may be provided in phases

Procedure – Breach Notification Data Controller to Data Subject

Where the personal data breach is likely to result in high risk to the rights and freedoms of the data subject, Explore Learning will notify the affected data subjects without undue delay.

- The notification to the data subject shall describe in clear and plain language the nature of the breach including the information specified above.
- Appropriate measures have been taken to render the personal data unusable to any person who is not authorised to access it, such as encryption.
- The controller has taken subsequent measure to ensure that the rights and freedoms of the data subjects are no longer likely to materialise.
- It would require a disproportionate amount of effort. In such a scenario there shall be a public communication or similar measure whereby the data subject is informed in an equally effective manner.