



Safeguarding and Child Protection Policy

For after-school clubs, tuition, online lessons and other Olé activities in England

Organisation	Olé Spanish for Everyone Ltd
Designated Safeguarding Lead (DSL)	Maria Torres Giron (MC Torres)
DSL email	info@olespanish.net
Policy owner	Managing Director / DSL
Approved and effective	6 September 2026
Next review	September 2027, or earlier following a legal change, incident or learning review
Version	3.0

Registered company address: 438 Oakleigh Road North, London, N20 0RZ

Immediate safeguarding action

If a child is in immediate danger

Call 999. Do not wait for the DSL or the host school. Take reasonable steps to keep the child safe, then notify the host school DSL and Olé DSL immediately.

If you have a concern, receive a disclosure or observe worrying behaviour

Record and report it immediately on the same day. Tell the host school DSL and the Olé DSL. Do not investigate, ask leading questions or promise confidentiality. If either DSL is unavailable and delay could place a child at risk, contact the local authority children's social care service directly.

Concern about an adult working with children

Do not confront the adult or investigate. Report immediately to the host school headteacher/DSL and the Olé DSL. If the concern is about Maria Torres Giron, report directly to the host school headteacher/DSL and the relevant Local Authority Designated Officer (LADO). Concerns meeting the harm threshold must be discussed with the LADO as soon as possible and within one working day.

Essential contacts

Emergency	Police / ambulance: 999
Police non-emergency	101
NSPCC	0808 800 5000 help@nspcc.org.uk
NSPCC whistleblowing advice line	0800 028 0285 help@nspcc.org.uk
Childline	0800 1111
Prevent / radicalisation advice	ACT Early: actearly.uk urgent threat: 999

Every club leader must enter the host school DSL, local children's social care and LADO details in the venue record before the first session. Contact details vary by local authority and must never be left "available on request".

1. Purpose and commitment

Olé Spanish for Everyone is committed to a child-centred culture in which children are heard, respected and protected from maltreatment, exploitation and harm, whether the risk arises at home, in the community, at an Olé activity or online. A child is anyone under 18. Safeguarding is everyone's responsibility, and the child's best interests are the primary consideration.

This policy sets the minimum Olé standard. Where an activity takes place on school premises, staff must also follow the host school's safeguarding, behaviour, online-safety, first-aid, emergency, collection and site procedures. If standards differ, staff must follow the safer requirement and seek advice from both DSLs.

The aims are to:

- prevent harm through safe practice, safer recruitment, training and clear professional boundaries;
- recognise abuse, neglect, exploitation, radicalisation and other welfare concerns early;
- respond promptly, proportionately and consistently to concerns and disclosures;
- work effectively with host schools, local safeguarding partners and statutory agencies; and

- keep accurate, secure records and learn from concerns, incidents and complaints.

2. Scope and status

This policy applies to all directors, employees, franchisees, club leaders, tutors, agency workers, contractors, volunteers and anyone acting for or representing Olé. It covers face-to-face and online provision, school and community venues, trips, events, communications, images and any contact arising from the role. Compliance is a condition of appointment, engagement or franchise operation.

Olé is an out-of-school and tuition provider. Keeping Children Safe in Education (KCSIE) is statutory guidance for schools and colleges; Olé aligns its practice with KCSIE when working in or on behalf of schools. The Department for Education's safeguarding guidance for out-of-school settings applies directly to the type of provision Olé operates. EYFS requirements apply where Olé is legally within scope of registered early-years provision.

No policy can replace professional judgement

If something does not feel right, record it and seek advice. Staff do not need proof before reporting a concern. A report made honestly and in the child's interests will be supported.

3. Roles and accountability

The Managing Director has overall accountability for safeguarding governance, resources and compliance. The DSL is the operational lead for safeguarding and child protection.

The Olé DSL will:

- be available during operating hours, directly or by an agreed remote arrangement, and ensure staff know the alternative escalation route;
- provide advice, manage referrals, liaise with host-school DSLs, children's social care, LADO, police, Prevent/Channel and other agencies;
- maintain secure safeguarding records and ensure information is shared lawfully and promptly;
- ensure staff induction, training and updates are completed and recorded;
- monitor patterns, low-level concerns, attendance or collection anomalies, complaints and incidents;
- review this policy at least annually and after significant incidents or changes in guidance.

All staff and franchisees must read this policy, the staff code of conduct and the relevant host-school procedures; complete required training; remain professionally curious; report concerns immediately; preserve confidentiality; and cooperate with statutory enquiries. The duty to act belongs to the person who has the concern and cannot be delegated away.

4. Working with host schools and venues

Before provision begins, the responsible franchisee or club leader must obtain and record:

- the name and contact route for the school DSL and deputy DSL, headteacher and on-site emergency contact;
- local children's social care, emergency duty team and LADO contact details;
- the school's safeguarding/child-protection, staff conduct, behaviour, first-aid, fire, lockdown, missing-child, collection, mobile-device and online-safety arrangements;
- how children are handed to the club, the authorised collection arrangements and what to do if a child is absent, missing or collected late;

- medical, allergy, SEND, communication and accessibility information necessary to keep each child safe; and
- the agreed supervision level, rooms, toilets, registers, site access and arrangements for a school staff member and first aider to be available.

A safeguarding concern arising during school-based provision must normally be reported to both the host school DSL and Olé DSL immediately. Staff must not assume that one organisation has told the other. The school retains responsibility for its own statutory duties; Olé retains responsibility for its staff, franchisees and actions.

5. Recognising abuse, neglect and exploitation

Abuse may be physical, emotional or sexual, or take the form of neglect. It may be inflicted by an adult or another child; occur inside or outside the home; be facilitated or carried out online; and involve one or several overlapping harms. The impact of seeing, hearing or experiencing domestic abuse is also relevant.

Possible indicators include unexplained injuries; a marked change in behaviour, attendance, presentation or wellbeing; hunger, poor hygiene or unsuitable clothing; fearfulness, withdrawal, aggression or sexualised behaviour; self-harm; age-inappropriate knowledge; concerning relationships; going missing; unexplained money or gifts; controlling contact; disclosure; or conduct by an adult that causes unease. Indicators are not proof, and their absence does not mean a child is safe.

Staff must be particularly alert to:

- domestic abuse, including children who see, hear or experience its effects;
- child sexual exploitation and child criminal exploitation, including county lines and financial exploitation;
- serious violence, gangs, trafficking, modern slavery and children who go missing;
- female genital mutilation (FGM), forced marriage and so-called honour-based abuse;
- radicalisation, extremism and terrorism-related concerns;
- online grooming, harmful content, coercion, cyberbullying and the creation or sharing of nude or semi-nude images, including AI-generated or digitally altered images;
- mental-health concerns when they may indicate abuse, neglect, exploitation or other risk;
- prejudice-based harm, including racism, faith-based prejudice, misogyny, homophobia, transphobia and disability-related abuse; and
- children who may face additional barriers to disclosure or recognition, including those with SEND, communication needs, limited English, health conditions, caring responsibilities or previous trauma.

6. Responding to a disclosure or concern

If a child speaks about harm, the adult must:

- 1 Listen calmly and give the child time. Do not express shock, disbelief or judgement.
- 2 Reassure appropriately. Say they have done the right thing by speaking and that the concern will be taken seriously. Never suggest they are to blame.
- 3 Do not promise secrecy. Explain that information will be shared only with people who need to help keep them safe.
- 4 Clarify only what is necessary. Use open prompts such as “Tell me what happened.” Do not ask leading, repeated or investigative questions.

- 5 Do not confront the alleged person or contact parents/carers yourself. Doing so may increase risk or compromise an investigation.
- 6 Act immediately. Call 999 if there is immediate danger or urgent medical need. Otherwise tell both DSLs on the same day before leaving the site.
- 7 Make a factual record promptly. Use the child's exact words where possible, distinguish fact from opinion, sign/date/time the record and note actions taken.

If the Olé DSL or school DSL is unavailable, or the response is inadequate and a child may remain at risk, the staff member must contact the local authority children's social care service or police directly. Anyone can make a referral. Concerns must not be deferred until the next working day merely because a session has ended.

Parents and carers

The DSL will usually work with the host school and statutory agency to decide when parents or carers should be informed. They must not be informed before advice is obtained if doing so could place a child or another person at greater risk, lead to loss of evidence, or prejudice an enquiry.

7. Recording, sharing and retaining information

The safeguarding record must include the child's name and date of birth (if known); date, time and location; people present; the exact concern or disclosure; observed injuries or demeanour without interpretation; action taken; persons notified; advice received; decisions and reasons; and the recorder's name, role and signature. Corrections must remain visible and be dated.

Safeguarding records are confidential and kept separately from ordinary teaching or customer records, with access limited to those who need it. They must not be stored on personal devices, informal messaging threads or personal email accounts. Records will be transferred securely to the relevant host school or agency where appropriate, while Olé retains the minimum record required for accountability under its retention schedule.

Data-protection law does not prevent necessary safeguarding information sharing. Staff should share relevant, accurate, timely and proportionate information with those who need it, record the decision and, where practicable and safe, be transparent with the child and family. Consent is not required where there is a lawful safeguarding basis to share.

8. Child-on-child abuse

Olé has a zero-tolerance approach to child-on-child abuse. It is never dismissed as "banter", "part of growing up" or an inevitable part of relationships. It may occur in person or online and includes bullying (including cyberbullying and discriminatory bullying), physical abuse, sexual violence, sexual harassment, harmful sexual behaviour, upskirting, coercion, abuse within intimate relationships, initiation or hazing, and consensual or non-consensual sharing of nude or semi-nude images.

Staff must report all concerns to both DSLs and take immediate steps to separate and safeguard children where needed. The response will be child-centred and proportionate, consider the needs and wishes of the child harmed, the needs and risks presented by the child alleged to have caused harm, and the safety of other children. Children will not be forced into mediation or face-to-face discussion. All decisions and reasons will be recorded.

Staff must never view, copy, print, forward or ask a child to send a nude or semi-nude image. Secure the device only if necessary and follow DSL/police advice.

9. Concerns or allegations about adults

The harm threshold may be met where an adult has behaved in a way that has harmed or may have harmed a child; may have committed a criminal offence against or related to a child; behaved towards a child in a way indicating they may pose a risk of harm; or behaved in a way indicating they may not be suitable to work with children, including transferable risk from conduct outside work.

Any such concern must be reported immediately to the Olé DSL/Managing Director and host-school headteacher or DSL. The case manager will seek LADO advice as soon as possible and within one working day, preserve evidence and follow agency advice. Olé will not conduct an internal investigation before LADO/police consultation. Suspension is not automatic; interim safeguards will be proportionate to risk. Ofsted or another regulator will be notified where Olé is registered or a legal notification duty applies.

If the concern is about Maria Torres Giron, it must be reported directly to the host school headteacher/DSL and the LADO. If a crime or immediate danger is suspected, call police.

Low-level concerns

A low-level concern is any concern, however small, that an adult may have acted inconsistently with the staff code of conduct but the behaviour does not appear to meet the harm threshold. Examples include over-familiarity, favourites, humiliating a child, unauthorised photography or isolated one-to-one contact. Low-level does not mean insignificant. These concerns, including self-referrals, must be recorded and reported promptly to the Olé DSL and host school in accordance with the school's process, so patterns can be identified.

Whistleblowing

Staff who believe safeguarding practice is unsafe, concerns are being suppressed, or action is inadequate must raise this with the Managing Director or host-school headteacher. If the concern involves them or remains unresolved, staff should contact the LADO, children's social care, police or the NSPCC whistleblowing advice line. No person will suffer retaliation for raising a genuine concern in good faith.

10. Safer recruitment and suitability

Olé will use a consistent safer-recruitment process proportionate to the role and legal eligibility of the organisation requesting each check. This includes:

- a clear role description and safeguarding expectations;
- identity, right-to-work and employment-history checks, with gaps explored;
- at least two satisfactory references where practicable, including the most recent relevant employer, verified directly and obtained before unsupervised work;
- the appropriate level of enhanced DBS check and children's barred-list check where the role is regulated activity and Olé or the authorised body is legally entitled to obtain it;
- overseas checks and professional/qualification checks where relevant;
- a safeguarding-focused interview and declaration of relevant information; and
- recorded induction, probation/monitoring and ongoing duty to disclose relevant changes.

No unchecked adult may have unsupervised access to children. A DBS certificate is only one part of safer recruitment and does not replace supervision, professional boundaries or reporting. Where a person is removed from regulated activity because they harmed or posed a risk to a child, or would have been removed had they not left, Olé will make a DBS referral where the legal conditions are met.

11. Staff conduct and safe working practice

Adults must maintain clear professional boundaries and follow the staff code of conduct. In particular, they must:

- use only approved organisational accounts, platforms and devices for communication; never connect with children through personal social-media accounts;
- avoid being alone with a child in a secluded place; keep doors open or maintain visibility and inform another adult when one-to-one support is necessary;
- never use degrading, sexualised, threatening, discriminatory or suggestive language, favouritism, secrecy, gifts or unnecessary physical contact;
- never transport a child alone, arrange private contact, babysitting or tuition outside approved arrangements, or share personal contact details without written authorisation;
- use physical intervention only as a last resort when necessary and proportionate to prevent immediate harm, and record/report it immediately;
- report any accidental boundary crossing, misunderstanding or situation that could be misinterpreted; and
- not work while impaired by alcohol, illegal drugs, misused medication, fatigue or any condition that makes safe supervision impossible.

12. Online safety, devices, images and AI

Online safeguarding risks include harmful content, unsafe contact, harmful conduct and commerce-related risks. Technology may facilitate grooming, bullying, sexual or criminal exploitation, radicalisation, financial abuse, misinformation, harmful challenges, image-based abuse and contact by people or generative-AI systems that simulate users.

Online lessons must use approved platforms and organisational accounts, with parent/carer knowledge and suitable privacy settings. Sessions must not be recorded unless there is a clear purpose, lawful basis, prior authorisation and informed notice. Staff must not move children to private messaging or ask them to disable safety controls. Concerns arising online are reported in the same way as face-to-face concerns.

Images of children may be created or used only for an approved purpose and with valid permission and host-school approval. Staff must use authorised equipment/accounts, avoid names or location data, store images securely and delete them according to the retention schedule. Personal phones must not be used to photograph or record children. Images must never be uploaded to public or consumer AI tools, altered by AI, used for face recognition, or repurposed beyond the permission given.

13. Prevent duty and radicalisation

Olé will protect children from being drawn into terrorism while respecting lawful speech, religion and political discussion. There is no single profile of a child at risk. Indicators may include concerning changes in behaviour or relationships, fixation on extremist material, justification of violence, online grooming or attempts to recruit others. Staff must avoid stereotyping and report facts, context and changes of concern.

Concerns are reported immediately to both DSLs. The DSL will consider local Prevent advice, a Prevent referral or Channel support. Call 999 where there is an immediate threat. Prevent concerns do not replace ordinary safeguarding or criminal-exploitation referrals and may require more than one pathway.

14. Attendance, handover, collection and missing children

A session register must record attendance and be updated promptly. Children must be handed into and collected from the club under the host school's agreed arrangements. A child may leave only with an authorised adult or under a documented independent-travel arrangement. Changes must be verified through approved parent/carer and school channels; a message shown by an unknown adult is not enough.

If a child expected at the club is absent, the leader must promptly check the school handover and follow the agreed absent-child procedure. If a child goes missing, the leader must alert the school immediately, maintain supervision of the other children, search only as the site plan allows, contact police/parents as directed and preserve a contemporaneous record. A child must never be left alone because a collector is late; follow the late-collection escalation procedure and consider safeguarding patterns.

15. Health, safety, first aid and inclusion

Safeguarding includes preventing impairment of physical and mental health. Each activity must have a suitable risk assessment, safe staffing and supervision, emergency procedures and access to an appropriately trained first aider. Staff must know the location and arrangements for emergency medication, including adrenaline auto-injectors, and follow the child's individual healthcare plan and school procedure. Medication is administered only by authorised, competent persons and recorded.

Olé is committed to inclusive provision. Reasonable adjustments and individual arrangements will be agreed with the school and parent/carer. SEND, disability, health needs, limited English or communication differences must never be mistaken for lack of credibility; they may increase vulnerability and create barriers to disclosure. Personal and medical information is shared with staff only to the extent needed to keep the child safe.

16. Training, supervision and quality assurance

All staff, franchisees and volunteers receive safeguarding and child-protection training, including online safety and Prevent awareness, at induction and before unsupervised work. They receive updates as required and at least annually. When working in schools, staff must read at least Part One of the current KCSIE guidance, or the alternative section directed by the school, and confirm understanding. The DSL undertakes role-specific training at least every two years and refreshes knowledge regularly, including local referral routes, allegations management, information sharing, SEND, online risks and trauma-informed practice.

Training attendance and policy acknowledgements are recorded. Safeguarding is included in supervision, observations and franchise quality assurance. Failure to follow safeguarding requirements may lead to immediate removal from duties while risk is assessed, disciplinary or contractual action, referral to statutory agencies or regulators, and/or termination of engagement or franchise rights.

17. Complaints, learning and policy review

Safeguarding complaints are handled under this policy first and must never be delayed by an ordinary complaints process. The DSL records actions and outcomes, reviews any incident for organisational learning, and considers whether practice, training, supervision, risk assessments or contractual controls require change.

This policy is reviewed annually and sooner following legislative or guidance changes, a safeguarding incident, a complaint indicating risk, an audit finding, or a significant change in provision. The current approved version must be issued to staff and franchisees and made

available to schools and parents/carers.

18. Legal and guidance framework

This policy has been updated with reference to the following legislation and guidance in force in England at the approval date:

- [Keeping Children Safe in Education 2026](#)
- [Working Together to Safeguard Children 2026](#)
- [Out-of-school settings: safeguarding guidance for providers \(updated February 2026\)](#)
- [Early Years Foundation Stage statutory framework, effective September 2026 \(where applicable\)](#)
- [What to do if you are worried a child is being abused: advice for practitioners](#)
- [Prevent duty guidance: England and Wales](#)
- [Information sharing advice for safeguarding practitioners](#)

Relevant legislation includes the Children Acts 1989 and 2004; Safeguarding Vulnerable Groups Act 2006; Protection of Freedoms Act 2012; Counter-Terrorism and Security Act 2015; Equality Act 2010; Human Rights Act 1998; Female Genital Mutilation Act 2003; Domestic Abuse Act 2021; Data Protection Act 2018; UK GDPR; and Data (Use and Access) Act 2025.

This policy is operational guidance, not legal advice. Local safeguarding-partnership procedures and directions from the police, children's social care, LADO, courts or regulators take precedence in an individual case.

Appendix A - Venue safeguarding record

Complete before the first session and review each term. Store with the venue risk assessment and make it accessible to the club leader.

Venue / school	
Full address	
Headteacher / venue lead	
Host-school DSL	
Deputy DSL	
On-site emergency contact	
Local authority children's social care	
Out-of-hours / emergency duty team	
LADO	
Local Prevent / Channel contact	
First aider and location	
Emergency medication location / procedure	
Handover and collection procedure	
Missing-child procedure location	
Date policies received / reviewed	
Completed by / date	

Appendix B - Safeguarding concern record

Complete promptly and report immediately. Do not delay reporting while finishing the form. Do not investigate.

Child's full name / DOB / class	
Date, time and place of concern or disclosure	
People present	
What was seen, heard or disclosed (use the child's exact words)	
Observable injuries, behaviour or demeanour (facts only)	
Open questions asked and child's response	
Immediate safety or medical action taken	

Appendix B - Safeguarding concern record (continued)

Child's name: _____ Date of concern: _____

Person(s) notified, time and method	
Advice / decision / referral and reasons	
Parent/carer informed? By whom, when, or reason not informed	
Recorder name, role, signature, date and time	
DSL follow-up and outcome	

After completion

Give or send this record securely to the Olé DSL and host-school DSL. Do not retain photographs or copies on a personal device. Record how and when it was transferred.