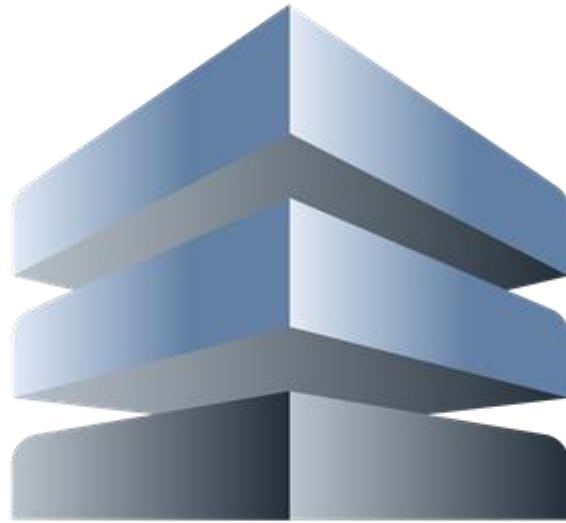




S H E C O M P L I A N C Y

SAFETY.HEALTH.ENVIRONMENT

training academy

Safeguarding Policy

Safeguarding Children Policy

Policy Statement

All children and young people have a right to fulfil their potential. They are entitled to:

-  Have their basic needs met
-  Be as physically and mentally healthy as possible
-  Gain the maximum benefit possible from good quality educational provision
-  Live and exist in safe environments free from harm
-  Experience emotional well-being
-  Become competent in looking after themselves, to manage and cope with everyday living with the support of others
-  Have as positive an image of themselves as is possible, along with a secure sense of identity irrespective of whether they have different or individual needs
-  Develop interpersonal skills and confidence

SHE Compliancy LTD is committed to helping Students achieve their full potential and in doing so will take an active part in the support of Students, their families and other children connected to or associated with the Company.

The company acknowledges that this can only be done by:

-  All staff, visitors and Students accepting their responsibility no matter what their status, role or professional qualifications;
-  Effective communication and information sharing across the Company, and necessary with external agencies;
-  All staff made up to date with developments as identified by national and local initiatives, guidance and protocols
-  Regular staff training on child protection and safeguarding issues in line with new legislation and local authority requirements.

This policy and related procedures follow the guidance provided in “Working Together to Safeguard Children” (2015)- last updated December 2023, the “Framework for the Assessment of Children in Need and Their Families” (2000), the “Children Act” (1989 and 2004), ‘Keeping Children safe in Education (September 2025) include post 16 education as set out Education and Training, (Welfare of Children Act 2021. Guidance has also been taken from ‘The Childcare Act’ (2006 and 2016) due to the nature of the training delivered within Early Years environments. This policy adheres to the guidelines and procedures produced by the local Government Association (LGA) Children and Young Peoples’ Department and its Safeguarding Children Board.

Purpose and Objectives

It is the Company policy to ensure a caring, friendly, and safe environment for all staff and students so that they can learn and work in a relaxed and secure atmosphere. We recognise we have a statutory duty to safeguarding and promoting the welfare of children, young people, and adults at risk of harm. Guidelines, procedures, training and personal support are in place so that staff and Students can confidently identify and respond appropriately to concerns relating to the safety of children.

It will ensure that designated personnel will be available to assist staff who identify concerns and that all concerns will be treated seriously.

No matter what the source of the information, the company will adopt the following procedure to ensure consistency. The procedure will consist of three steps:

-  Information gathering
-  Analysis
-  Action

It will ensure that all concerns about children are recorded accurately and where possible in the language given by the source of the concern. It will be stored securely and in line with the Company archiving policy.

Through the implementation of this policy, we aim to:

-  Teach student how to keep safe and recognise behaviour that is unacceptable.
-  Identify the expectations of all staff and to promote their understanding and responsibilities relating to safeguarding legislation and statutory guidance.
-  Ensure relevant and effective safeguarding practices are in place and staff are appropriately trained to carry out practices.
-  Promote awareness to staff of the need to safeguard children, vulnerable adults, and all people and to raise awareness of different types of abuse and indicators of safeguarding concerns.
-  Ensure the fundamental rights and needs of apprentices are observed.
-  Ensure staff and apprentices are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, and gender.
-  Take suspicions and allegations of abuse including risks of radicalisation extremely seriously and to respond to concerns in a timely manner and with consideration.
-  Provide guidelines for staff in handling matters relating to actual or suspected child abuse.
-  Prevent the risk of abuse by ensuring procedures and standards are in place and that staff act professionally.
-  To ensure that the fundamental rights and needs of apprentices, staff and other stakeholders affected by safeguarding issues are observed and that staff are supported when dealing with a safeguarding issue.
-  Deter potential, unsuitable individuals from applying to SHE Compliancy Limited demonstrating our attentiveness and vigilance in relation to safeguarding through our website, job advertisements, and our Safer Recruitment Process.
-  Reject anyone who applies to work with us or supply us with services where we have doubts about their suitability

-  Work in partnership and in accordance with external organisations.
-  Have an appropriately trained Designated Safeguarding Lead (DSL) in place at all times to advise on and manage any concerns and referrals.
-  Have an appropriately trained Deputy DSL in place wherever possible.
-  Ensure sensitive personal data is processed in accordance with the requirements of GDPR.
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Coverage and Scope

This policy applies to the support of children and young people up to their 18th birthday as defined by the Children Act 1989 (and 2004). For those young people reaching their 18th birthday who need continuing services and support, this can be extended to their 25th birthday.

In the context of working in Further Education, where the majority of individuals are over the age of 16, it is important to recognise that whilst the law allows consensual sexual activity at the age of 16, if the child requires help and support the lawful nature of the activity does not stop intervention.

Examples of this may be:

-  Children who despite their legal age are vulnerable because of disability;
-  Children in relationships with much older individuals or individuals in a position of authority and trust
-  Children who may be at risk of sexual abuse or exploitation;
-  Children who are parents;
-  Children whose emotional needs mean they are unlikely to be able to protect themselves despite their legal age.

Promotion of this policy

This policy is shared with all new staff during their induction process and all updates to this policy are shared amongst the team. This policy is located in the resources section on SHEDrive, and is accessible to all tutors, IQA's, EQA's, centre managers, Students and employers. Safeguarding is discussed with Students at all reviews, and staff are referred to this policy if they require any additional information. This is a controlled document. Whilst this document may be printed, the electronic version posted on SHEDrive is the controlled copy. Any printed copies of this document are not controlled.

Responsibilities

The Directors are responsible for ensuring that robust safeguarding policies and procedures are in place, that they are regularly reviewed, and effectively communicated to all students, staff, facilitators / coach tutor assessors, employers and suppliers. The Directors must lead by example, demonstrating a commitment to prioritising the safety and welfare of all individuals involved in SHE Compliancy Limited activities. They are accountable for providing adequate resources and support to enable staff to fulfil their safeguarding responsibilities effectively. Additionally, the Directors must stay informed about relevant safeguarding legislation and best practices, ensuring that SHE Compliancy Limited remains compliant and responsive to emerging safeguarding concerns.

Other Stakeholders' Responsibilities:

-  **Senior Management** is responsible for ensuring the implementation of the Safeguarding Policy, and that processes and procedures are robust, up to date, and implemented.
-  **Designated Safeguarding Lead (DSL)**, which means the DSL or the Deputy DSL where the DSL is not available, is responsible for the management of safeguarding issues including concerns for Student welfare and reports to the Directors on any issues that arise. The DSL carries out investigations where appropriate and coordinates escalation processes liaising with external bodies such as local multi-agency safeguarding partnerships where cases of suspected abuse or allegations are raised. The DSL is not entitled to give formal legal advice but is able to obtain such advice from experts and maintains links with local multi-agency safeguarding partners, informing, and advising on legislation changes and current safeguarding themes. The DSL monitors the safeguarding@everythingapprenticeships.com inbox and ensures all concerns are dealt with in a timely and appropriate manner. The DSL is responsible for making a barring referral and has responsibility for raising awareness across all staff relating to the welfare of children, young people and adults.
-  **Facilitators / coach tutor assessors and staff** must actively uphold the principles outlined in this Policy and check the safety and welfare of Students during each training session and interaction with them. They must be aware of safeguarding indicators and follow correct reporting procedures if they suspect a safeguarding concern. Student absences must be dealt with in line with the Absence Policy.
-  **Students, employers, and other stakeholders** have a responsibility to report any concerns in line with this Policy.

The Designated Safeguarding Lead (DSL)

-  Nicholas Cooper-Hicks
-  nicholas@shecompliance.co.uk
-  Safeguarding@shecompliance.co.uk
-  Office Hours 01708 751 222
-  Out of Hours 07903207894

Deputy DSL

-  Bobbie Lovett
-  bobbie@shecompliance.co.uk
-  Safeguarding@shecompliance.co.uk
-  Office hours 01708 751 222
-  Out of hours 07570 833 544

SHE Compliance Limited is part of London Borough of Havering Council and has identified and established contact with the Local Authority Designated Officer (LADO). In all cases where allegations are made against people who are in contact with, SHE Compliance Limited Students, the DSL will consult with the LADO detailed below. We also maintain a list of all LADO contact details in each of the Local Authority areas where our students live and are employed.

Allegations of abuse made against a member of staff, or any other person employed SHE Compliancy Limited to deliver support or services to any of its students will be reported immediately to the appropriate authorities including the London Borough of Havering Council LADO and Metropolitan Police. The individual concerned will be suspended / removed from their duties pending further investigation.

Staff must be vigilant for any signs that a person may be in danger. The 5 Rs of safeguarding are designed to help people remember and understand how they can do this in the best possible way.

-  RECOGNISE
-  RESPOND
-  REPORT
-  RECORD
-  REFER

You must have a clear understanding of the different signs and symptoms of potential abuse, harm, and neglect.

If you do have a safeguarding concern, you must respond appropriately, and not ignore the situation.

Safeguarding concerns must be reported without delay, and with full consideration of the need for confidentiality.

Take precise, comprehensive notes that detail the facts about the safeguarding concern. Include who, what, why, when, and where.

The DSL is responsible for passing on concerns of safeguarding to the appropriate authorities.

Full training is provided to all staff and wider stakeholders to help them recognise the signs and symptoms of potential abuse, and respond, report, and record the information in a way that complies with this policy, and ensure SHE Compliancy Limited protects those who engage with its services.

Definitions

The Company adopts the definition of harm as laid down by the Department of Health as follows:

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, institution or community setting; by those known to them or, more rarely by a stranger. They may be abused by an adult or by adults or another child or children.

Physical Abuse: - This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Emotional Abuse: - This is the persistent emotional ill treatment of a child that can cause severe long-lasting effects on a young person's emotional development. It may involve, for instance,

conveying to a young person that they are worthless, unloved and inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child in participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It might involve serious bullying causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse: - This involves forcing or enticing a young person to take part in sexual activities/ child sexual exploitation, including prostitution/ human trafficking, whether or not the young person is aware of what is happening. The activities may involve physical contact including penetrative or non-penetrative acts. They may include non-contact activities such as involving young people in looking at, or in the production of, pornographic material or encouraging young people to behave in sexually inappropriate ways.

Neglect: - This is the persistent failure to meet a young person's basic physical and/or psychological needs which is likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born neglect is failing to provide adequate food, shelter and clothing, failing to protect a young person from physical or emotional harm or danger, failing to ensure adequate supervision, including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It can also include neglect of, or unresponsiveness to, a young person's basic emotional needs.

Domestic Violence: - Prolonged and/or regular exposure to domestic violence can have a serious impact on a young person's development and emotional well-being, despite the best efforts of the parent who may be the victim, to protect the young person. Young people's exposure to parental conflict, even where actual violence is not present can lead to serious anxiety and distress. Young people are like to show signs of stress because of domestic violence. This may result in behavioural problems, depression, and a tendency to aggression or withdrawal.

Bullying: Staff should also be mindful of the threat of bullying. Young people are vulnerable to bullying, which is deliberately hurtful and harmful behaviour, usually repeated over a period of time from which it is difficult to defend themselves. It can take many forms but the three main types are:

 **Physical** – (For example, hitting, kicking, theft, extortion)

 **Verbal** – (For example, racist or homophobic remarks, threats, name-calling)

 **Emotional** – (For example, isolating an individual from the activities and social acceptance of other young people).

The damage inflicted by bullying must not be under-estimated; it can cause considerable distress, affect the young person's health and development and cause significant harm. Therefore, staff should also report suspicions or allegations regarding bullying to their line manager who must investigate and possibly invoke the Child Protection procedures.

FGM (Female Genital Mutilation)

According to the NHS, FGM is 'also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse. It's very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health problems.'

<https://www.nhs.uk/conditions/female-genital-mutilation-fgm/>

All staff at SHE Compliancy Ltd receive full training on FGM.

Exploitation:

Including theft, fraud, sexual (including sexploitation) forced marriage, forced labour through modern slavery and or human trafficking.

Victimisation

Self-harm:

Such as neglecting to care for personal hygiene, health or surroundings.

Vulnerable adults are considered vulnerable if they are:

-  Substantially dependent upon others in performing basic physical functions, or their ability to communicate with other providing services, or to communicate with others, is severely impaired.
-  Living in in sheltered housing or residential accommodation, such as a care home or a residential special school.
-  Receiving any form of health care or domiciliary care in their own home.
-  Detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act.
-  In contact with probation services.
-  Receiving a welfare service.
-  Receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions.
-  Receiving direct payments from a local authority in lieu of social care services.
-  In need of assistance in the conduct of their own affairs.

A person may be deemed at risk of a safeguarding issue due to other factors such as:

-  Poor numeracy and literacy skills, or a specific learning need.
-  Where English is not a first language.
-  Having an unsupportive employer.
-  Member of an under-represented group.
-  Is acting as a carer for another family member or is a young carer.
-  Has a background of offending or is showing signs of being drawn in to antisocial or criminal behaviour.
-  Has a disability or social need.
-  Has special educational needs (whether or not they have a statutory Education, Health, and Care Plan).
-  Lives 'In Care' or has recently transitioned out of Care.
-  Is frequently missing or goes missing from care or from home.
-  Is within a family circumstance presenting challenges.

Prevent Duty

Prevent duty training is mandatory for all staff at SHE Compliancy Ltd. This includes information on radicalisation, extremism and the signs of this taking place with the young people we support and work with.

Prevent duty outlines how to recognise the signs of this taking place, and who to contact to prevent radicalisation. More detail can be found in the companies prevent policy.

The wider concept of safeguarding

All staff members working at SHE Compliancy Ltd must also take into consideration the wider concept of safeguarding, and understand that we must safeguard individuals from:

-  Child sexual exploitation (CSE) (Working Together to Safeguard Children" (2015)- last updated December 2023)
-  Child criminal exploitation (CCE) (Working Together to Safeguard Children" (2015)- last updated December 2023)
-  Extremism and radicalisation (Counter-Terrorism and Security Act 2015.)
-  Mutilation- Burning, tattooing, physical punishment for cultural or religious practices (Serious Crime Act 2015)
-  Online safety act 2023 /Cyber bullying/ Grooming Child on child sexual violence (Sexual Offences Act 2003- renewed 2012)
-  Forced Marriage (The Anti-social Behaviour Act 2014, Crime and Policing Act 2014 and 2025)
-  Protection from Sexual Harassment or sexting (Equality Act 2010)
-  Protection from Sex-based Harassment in Public Act 2023
-  'Upskirting' (Voyeurism Offences Act 2019)
-  Domestic Violence act 2021
-  Hate crime (Equality Act 2010) Currently under review
-  Modern slavery/ trafficking (Modern slavery act 2014- Updated 2019)

 Children's Mental health and wellbeing, and healthy relationships Staff are responsible for reporting any of these concerns to the designated safeguarding officer immediately, and discussions regarding any concerns are also held at each assessor monthly 121 meeting.

Reporting a Safeguarding Concern

In all instances, staff must record details of a safeguarding concern raised or witnessed on the Safeguarding Incident Form. Staff who do not have access to the form must telephone the DSL or, if the DSL and Deputy DSL is not available, send an email to safeguarding@shecompliance.co.uk with a brief explanation of the safeguarding concern. The DSL, Deputy DSL, or the Directors (if the DSL / Deputy DSL is not available) will contact the member of staff and record the details of the concern and complete the form on their behalf.

The DSL must be informed immediately when a student does not attend a pre-arranged training session, one-to-one, or review. The DSL will follow the procedure outlined in the Absence Policy. Where the absence also gives rise to a safeguarding concern, the DSL will complete a Safeguarding Incident Form.

PEER-ON- PEER ABUSE

Staff must remain vigilant to the signs of peer-on-peer abuse which may include physical and sexual abuse, sexual harassment and violence, emotional harm, on and offline bullying, and relationship abuse. It can even include grooming for sexual and criminal exploitation. Where a member of staff believes a student is being subjected to peer-on-peer abuse, they must take immediate action to ensure the safety and wellbeing of the individuals involved and report the incident to the DSL immediately. Any instance of abuse by a Student of another Student will be reported to the employer of the student(s) perpetrating the abuse.

Peer-on-peer abuse involving staff will be dealt with via our internal disciplinary and grievance procedures.

IF A STUDENT RAISES A CONCERN OR MAKES AN ALLEGATION

Staff must record all information on the Safeguarding Incident Form. Details must be recorded accurately, and staff should not make any judgements or assumptions about the information given by the student. Guidance is given on the form about the actions required to secure the immediate safety of the student. Staff must request the student's consent to refer the concern to the DSL. If the Student's safety and / or wellbeing is at risk the matter must be referred to the DSL even if the student withholds consent. Staff should advise the student that they have a duty of care to refer the concern. The DSL will decide the appropriate course of action and update the Safeguarding Incident Log with details of this.

IF A THIRD PARTY RAISES A CONCERN OR MAKES AN ALLEGATION

Staff must record all information on the Safeguarding Incident Form, including contact details of the third party. Be mindful of confidentiality. Students who are aged 16 and above and of employed status are deemed adults. Do not pass on any follow up information to any third party without the consent of the student that the concern relates to.

IF A CONCERN RELATES TO A MEMBER OF STAFF

If any individual wishes to raise a concern regarding a member of staff, they must contact the DSL. If any member of staff becomes aware of a concern regarding another member of staff, they must refer the person raising the concern immediately to the DSL. The DSL will follow the protocol outlined in the Whistleblowing Policy.

OBSERVATION OF A CONCERN IN THE EMPLOYER'S SETTING

If any member of staff becomes aware of, or observes a concern, whilst on an employer's premises they should stop the activity they or the students are currently engaged in and inform the individual involved of the concern and ask them to remove themselves from the area and report the concern to their designated manager. Staff must take action to secure the safety of themselves and any Students at risk.

Staff must be mindful of the differences between poor practices and safeguarding issues and apply any actions appropriately, including recording the safeguarding concern on the Safeguarding Incident Form and referring this to the DSL who will decide the appropriate course of action and record this on the Safeguarding Incident Form.

STUDENT REPORT OF A CONCERN IN THE EMPLOYER'S SETTING

If a student reports a safeguarding concern that they are aware of in their employer setting, advise the student to follow the employer's in-house reporting or whistleblowing procedures, and offer support and intervention if required.

REPORTING FGM

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they are either informed by a girl under 18 that an act of FGM has been carried out on her, or observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

MASH team 01708 433222 (day) 01708 433999 (night)

<https://my.havering.gov.uk/Pages/OnlineForms/Multi-Agency-Referral-form.aspx#Information>

LADO : Lisa Kennedy e: lado@havering.gov.uk Tel: 01708 431653

Alternative **LADO** contact for Havering school: Donna Wright 01708 431653

Education: SEN- Sen@havering.gov.uk 01708 431885

Interim Headteacher – Darren Purdie – darren.purdie@havering.gov.uk

Havering School Nursing - NELFT NHS Foundation Trust - 0300 300 1635

Child Protection Officer for Education - 01708433842

DfE – Mental Health and Behaviour in schools

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

Havering Safeguarding Partnership (formerly the Havering LSCB)

<https://www.havering.gov.uk/safeguarding-children>

NSPCC, Undertaking remote teaching and learning safely

<https://learning.nspcc.org.uk/news/2020/march/undertaking-remote-teaching-safely>

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present.

Staff should act with at least the same urgency as is required by safeguarding processes. A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made.

Staff who think they are dealing with a case of FGM are strongly advised to consult with the DSL as soon as practicable, and to record and maintain clear and factual records which may be used as supporting evidence.

INDUCTION AND TRAINING

She Compliancy Limited provides training to ensure all staff, facilitators / coach tutor assessors and other associates and partners have the necessary skills, knowledge, and experience to assist them in the exercise of their duties in line with this Policy.

Safeguarding training is provided to all staff as part of their induction and periodically as part of their mandatory training, in accordance with our Professional Development Policy, along with access to relevant training resources and ongoing legislative updates. This training will ensure that staff develop their understanding of the signs and indicators of abuse, neglect, bullying and / or harassment, and that they know how to respond to an individual that discloses any concern covered by this Policy. All staff will undergo annual refresher training.

TEACHING, LEARNING AND ASSESSMENT

All SHE Compliancy Limited programs will provide a broad and balanced curriculum, delivered by skilled professionals, and will include awareness of safeguarding issues. SHE Compliancy Limited will provide:

-  Development opportunities for staff to ensure they can recognise the signs and symptoms of possible abuse in all its forms.
-  Record details about any Student, particularly in relation to potential indicators of abuse or neglect, confidentially and appropriately.
-  Work closely with employers to ensure that they have appropriate and effective safeguarding policies and procedures in place.
-  Integrate safeguarding and wellbeing into our sessions to Students.
-  Provide Students with an opportunity to discuss confidential issues and concerns with an appropriately trained member of staff.
-  Provide regular communications to staff, Students, and their employers about safeguarding and related issues.

SUPPORTING STAFF

Staff who become involved with a student or vulnerable person who has suffered harm, or appears to be at risk of harm, may find the situation stressful and upsetting. SHE Compliancy Limited will support all individuals by providing them with opportunities to discuss their anxieties with a suitable qualified mental health first aider, or a member from the senior management team or directors.

Time off will be provided to staff to access external support.

PROTECTING OURSELVES

Staff should take all reasonable precautions to protect themselves against allegations of abuse. They must avoid personal and social contact with Students, and steps to minimise the risk of any situation arising in which misunderstandings can occur.

Staff must not:

-  Engage in flirting, innuendo, suggestive remarks, discriminatory comments or make suggestions.
-  Issue or threaten any form of physical punishment.
-  Engage in any sort of sexual relationship with a student.
-  Photograph or film Students without prior consent or where the photograph or film does not relate to the evidencing off-the-job learning that is relevant to the apprenticeship or retain photographs or film on personal devices.
-  Send any audio and / or visual material that has inappropriate content to Students.
-  Invite or allow a student to their home, or any other location where the purpose is one of friendship or an intimate relationship.
-  Do things of a personal nature for Students that they can do for themselves.
-  Dismiss an allegation of any sort relating to a student's welfare or delay the reporting of an allegation.
-  Withhold any disclosure should they suspect abuse.

-  Spend excessive amounts of time alone with Students away from others.
-  Make unnecessary physical contact with Students. There may be occasions where physical contact is unavoidable – staff should make every effort to ensure contact only takes place with consent of the individual and should be mindful that some individuals practice non-contact.
-  Meet / arrange to meet a student outside of working hours unless it is with consent of the senior managers or directors.
-  Befriend or chat to Students/apprentices on private social network sites.
-  Give or receive gifts and / or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a student.

Staff must:

-  Work in rooms and locations with Students where they can be visibly seen by others.
-  Plan in-person activities that involve more than one other person or that are within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why.
-  All email communication should be sent to Students using the SHE Compliancy email. Comprehensive. This process ensures that all emails are securely recorded and easily monitored.
-  Be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSL.
-  Treat all Students equally and with respect.
-  Ensure allegations or disclosures by a student are taken seriously and reported.
-  Use professional language when writing, phoning, emailing, or using social media to communicate with Students.
-  Be aware that Students can develop infatuations (crushes) towards those working with them. If you suspect this is happening, tell the DSL who will respond to the situation in a way that maintains the dignity of all concerned.
-  Act as a role model.
-  Set and monitor appropriate boundaries and relationships when working with Students based on openness, honesty, and respect for them.
-  Respect a student's right to personal privacy but never agree to keep any information relating to the harm of a student confidential.
-  Provide support to a student making a complaint.
-  Report any concerns without delay and record all the facts.

Staff who do not comply with this Policy and those who are the subject of a safeguarding allegation may be subject to our internal disciplinary and grievance procedures.

RECORDS

SHE Compliancy Limited will maintain clear, comprehensive records of any safeguarding concerns. The company will comply with the requirements of the Data Protection Act 2018, which allows for disclosure of personal data where this is necessary to protect the student. It is therefore vital that all records include precise and detailed information using the words of the individual making the disclosure or raising the concern. Information will be accessible only to those who need to access it as part of further investigation or any action necessary.

The DSL monitors safeguarding incidents to identify emerging trends or patterns, enabling proactive intervention and the implementation of relevant preventive measures or further training to minimise the likelihood of further recurrence.

SAFE RECRUITMENT AND SELECTION

SHE Compliancy Limited will comply with best practice in the recruitment and training of its staff, in line with legislative requirements. The SHE Compliancy Limited Recruitment Policy supports this document. We will ensure safeguarding considerations are incorporated into every stage of the recruitment process. Applicant identities are checked at interview and all job offers are subject to appropriate references being supplied. Individual's criminal convictions are checked on appointment, as appropriate to the job role, via Enhanced DBS Disclosure and used in the interim with additional supervision and monitoring in place.

Where DBS checks are necessary, we maintain a central DBS register, with 3 yearly renewals in place as follows:

-  Standard DBS checks where necessary are carried out for administrative non-teaching staff who do not come into direct contact with Students under 18.
-  Enhanced DBS checks are carried out where necessary for all staff who are in direct contact with Students under 18.

Through our safeguarding training we ensure Students understand what a DBS check is, and whether it is required for their job role. The employer is ultimately responsible for ensuring anyone they employ has the necessary checks in place. However, we do support employers to engage with the Disclosure and Barring Service to fully understand their role and responsibility.

CONFIDENTIALITY

All matters relating to welfare and safeguarding are highly confidential. SHE Compliancy Limited will only disclose information, both internally and externally, on a 'need to know' basis. Records and referral details will be made and stored on electronic systems accessible by the DSL and Deputy DSL and classified as Confidential.

WHISTLE BLOWING

Everyone has the right, and a responsibility, to raise concerns about the behaviour of staff, Students, volunteers, or other stakeholders when such behaviour may be harmful to others in their care and will receive appropriate support from us when doing so. All stakeholders are encouraged to share any concerns they may have so that problems can be identified, dealt with, and resolved quickly without prejudice to their position. Further information on Whistleblowing can be found in the Whistleblowing Policy.

IT USAGE

Recognising the paramount importance of online safety education, SHE Compliancy Limited is committed to educating both staff and Students on how to remain safe online and the responsible use of technology and the internet.

Staff members are responsible for ensuring that Students are well-informed about best practices in online safety and acceptable behaviour and usage of SHE Compliancy Limited equipment. This is covered during Student inductions at the start of their apprenticeship training and at regular intervals throughout. We share information with Students about the proactive measures we take to shield Students from cyberbullying, exposure to unsuitable online content (e.g. content that includes references to or depiction of self-harm and / or suicide), and other potential risks. We also encourage open discussion about the potential of online risks during interactive learning sessions.

All SHE Compliancy Limited computing equipment and / or devices which access the internet are protected by a firewall which is configured to filter out inappropriate content or block access to specific websites as detailed in our IT and Software Management Policy, and our Information Security Policy. However, we recognise that sometimes content can be accessed inadvertently. To ensure responsible usage and in line with these policies, internet activity may be checked at regular intervals. This monitoring serves to not only track the frequency of internet usage but also to assess the nature of the accessed content and ensure the suitability of SHE Compliancy Limited firewalls to ensure we are providing the necessary protection for staff and Students.

Material, which is deemed inappropriate, whether accessed via the internet or stored on electronic devices, will result in disciplinary action in accordance with the disciplinary and grievance procedures.

Policy expectations

All members of staff working within Company in whatever role will be accountable to this policy, and have a responsibility to take seriously all concerns that come to their attention. The member of staff identifying the concern will, as a matter of professional duty, pass that concern onto the appropriate named members of staff within the related procedures.

Students or children, who have concerns about other children/ Students or the behaviour of adults towards them, can use this policy to ensure that they are taken seriously.

Placement providers and subcontractors must be informed about this policy and deal with any concerns reported to them in line with this policy by contacting the designated member of staff.

Given the company's commitment to ensuring the welfare of its students and children, information will be given to staff and Students at induction and in the relevant literature, to outline that commitment. This information must emphasise:

-  The legal obligations of the company and of individuals
-  The importance of Student and staff concerns being taken seriously
-  The need for concerns and action taken to be recorded
-  The rules associated with confidentiality and disclosure
-  That parents may have to be consulted unless this will cause further harm to the child
-  How staff are supported in implementing the procedures

It is recognised that the Company has many diverse groups of Students e.g. Students with learning difficulties or those who have English as their second language, and the application of this policy will need to be sensitive to their differing needs.

In order to properly assess concerns and take appropriate action it will be necessary to discuss concerns with colleagues and other relevant staff within the company or other related organisations. Legislation makes it clear that it is acceptable to exchange information as long as the information is accurate, adequate, relevant, not excessive, has the necessary consents and is in line with the legal duty to prevent harm to children. This will also comply with the General Data Protection Regulations (The Data Protection Act 2018), The Data (Use and Access) Act 2025.

Statutory Framework

Section 175 of the Education Act 2002 and 2018 places a statutory responsibility on She Compliancy to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the She Compliancy. We have developed the SHE Safeguarding Policy within the context of appropriate procedures and the monitoring of good practice in London are the responsibilities of the BHR Safeguarding Partnership. In Havering, all professionals must work in accordance with the BHR Safeguarding Partnership Multi-Agency Safeguarding Arrangements.

Relevant legislation and guidance documents are listed at the end of this document

Quality and Monitoring

It is Company policy to ensure that all staff are briefed during their induction, have access to regular training, and that designated personnel have regular contact with consultants and Local Authority Social Care Departments with to ensure that guidelines and procedures meet with nationally agreed recommendations.

The policies and procedures will be examined on an annual basis for accuracy and updated in between if required.

All staff will be notified of any changes and updates to this policy and will be required to keep an updated CPD log including safeguarding updates.

APPLICABLE LAWS, REGULATIONS AND OTHER POLICIES:

This Policy has been written in line with the following legislations and regulations:

KCSIE Keeping Children safe in Education 2025

https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf

Working together to safeguard children 2023

https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf

PROMOTION AND COMMITMENT

We are committed to ensuring that all staff and wider stakeholders fully understand, comply with, and actively engage with our policies. Directors and senior management are dedicated to fostering a culture of policy adherence and continuous improvement.

Our induction process ensures that new staff members are introduced to our policies from the outset, providing them with the necessary information and guidance to adhere to our standards. Additionally, our annual appraisal process includes a thorough review of staff implementation of our policies, recognising and celebrating successes while identifying areas for improvement.

SHE Compliancy Limited considers staff and wider stakeholder insights and perspectives when refining and reviewing its policies. This ensures our policies remain relevant, effective, and responsive to the evolving needs of our organisation and stakeholders.

This policy should be read in conjunction with:

-  Online Safety Policy
-  Whistle Blowing Policy
-  Bullying and Harassment Policy
-  Safer Recruitment Policy
-  Prevent Policy
-  Prevent reporting procedure
-  Modern slavery Policy
-  Inclusion Practice

Monitoring reviewing

1. This policy will be monitored and reviewed annually by the Chair, MD and DPO.
2. The Chair will be responsible for monitoring any changes to legislation that may affect this policy, and make the appropriate changes accordingly.
3. The Chair/ MD will communicate changes to this policy to all members of staff.
4. The scheduled review date for this policy is January 2027.

Signature



Mr Robert Hicks

Director SHE Compliancy Limited

Date: 09/01/2026

Learner Incident Report

Please use this form to report to the Company any incident or disclosure relating to child protection, child in need, vulnerable adult or behaviour

Student Name _____

Course _____

Student ID _____ Date of Birth _____

Address _____

Contact telephone No _____

Name of Parents/Guardians _____

Parents'/Guardians' Address _____

Parents'/Guardians' Contact No _____

Direct from Student

☐

Referral

☐

From _____ Date _____

Complaint

☐

From _____ Date _____

Phone Call

☐

From _____ Date _____

Description of issue/incident (continue on separate sheet if necessary)

Signed _____ Date _____

Role _____

REFERRAL ACTION (date, time and contact details)

Children or Adult Services

Police or other agency

Parents/Guardians/Employers/School (if appropriate)

Other Company Staff E.g. Mentors, Additional Support

HR (if member of staff is implicated)

Outcome and feedback (Ongoing action with dates)

Signed _____ **Date** _____

Role _____

