Pareto

A Randstad company

Safeguarding and Prevent Policy

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Approved By: Governance Board
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Policy Owner: Deputy Designated Safeguarding Leads
Policy Authority: Designated Safeguarding Lead

How to Report a Concern:

- **Urgent Safeguarding Phone Line: 01625 810643**
- **Email: safeguarding@pareto.co.uk** (monitored during office hours)
- **Online Reporting Form: [Link to Online Form]**

If you believe a learner is in immediate danger of harm, you must call 999 immediately, then report the incident to the Pareto DSL as soon as it is safe to do so.

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1. Policy Statement and Introduction

Pareto is fully committed to its responsibility to safeguard and promote the welfare and well-being of all our learners. We recognise that all learners have a fundamental right to be protected from harm, abuse, neglect, and discrimination. This policy provides a clear framework for a safe, supportive, accessible, and inclusive learning environment for everyone engaged in our apprenticeship programmes.

At Pareto, safeguarding and Equity, Diversity, and Inclusion (EDI) are intrinsically linked. We believe that a diverse, equitable community of learners and staff is fundamental to driving personal growth, professional development, and high performance. We take a zero-tolerance approach to all forms of abuse, radicalisation, discrimination, harassment, victimisation, and prejudice-based harm. Our goal is to remove barriers and ensure every stage of the apprenticeship journey is fair, safe, and transparent for all.

Our approach is learner-centred, child-centred, and whole-family focused. We will always act proportionately and in the best interests of the learner. This policy applies to all learners, with a particular focus on the specific needs of our 16–18 year old cohort, care leavers, learners with Special Educational Needs and Disabilities (SEND), and adults who may be at risk or have care and support needs.

We have written this policy in full alignment with current legislation, statutory guidance, and internal governance frameworks, including:

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children 2026
- The Prevent Duty Guidance (Counter-Terrorism and Security Act 2015, updated 2023/2026)
- The Care Act 2014
- Equality Act 2010 (incorporating the Public Sector Equality Duty)
- Data Protection Laws: Data Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025
- Information sharing: advice for practitioners (2024)
- Victims and Prisoners Act 2024 (Operation Encompass statutory scheme)
- Crime and Policing Act 2026
- Ofsted Further Education and Skills Inspection Toolkit (2026)
- Pareto Equity, Diversity & Inclusion Policy (v4, 2026)

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2. Core Safeguarding and EDI Principles

Our safeguarding and inclusive practices are underpinned by the six key principles of the Care Act 2014, augmented by Pareto's Core EDI Values:

- **Empowerment:** Supporting individuals to make their own decisions, give informed consent, and shape their learning journey.
- **Prevention:** Taking proactive action before harm or discrimination occurs, fostering resilience across all delivery models.
- **Proportionality:** Providing the least intrusive, most supportive response appropriate to the risk or need presented.
- **Protection:** Delivering targeted support, representation, and advocacy for those in greatest need or facing additional vulnerabilities.
- **Partnership:** Working collaboratively with local safeguarding partners, employers, police, health services, and community groups to provide a collective response.
- **Accountability:** Ensuring complete transparency, governance, and auditability in delivering safeguarding and equity.
- **Valuing Diversity & Ensuring Fairness:** Viewing diversity as an asset that enriches learning, actively protecting staff and apprentices from bias, and upholding our reputation as an ethical training provider.

3. Scope

This policy applies universally to everyone connected with Pareto, including:

- All prospective, enrolled, and progressing apprentices (from 16–18 year olds to adult professionals).
- All Pareto employees, senior leaders, Skills Coaches, Trainers, assessors, contractors, consultants, agency staff, and volunteers.
- Employer partners and their workplace mentors, who are expected to share and uphold our safeguarding and EDI commitments.
- All visitors to Pareto training facilities, employer sites, or online learning platforms.

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4. Key Safeguarding and EDI Contacts at Pareto

Anyone with a safeguarding concern, disclosure, or incident of discrimination should report it immediately to the Designated Safeguarding Team:

- **Designated Safeguarding Lead (DSL) & Head of Quality**:
  Dan Gagg — dgagg@pareto.co.uk | Direct Tel: 07951111778

- **Deputy Designated Safeguarding Lead (DDSL)**:
  Anne Hill — ahill@pareto.co.uk | Direct Tel: 07780 467 599
- **Deputy Designated Safeguarding Lead (DDSL)**:
  Anna Gagg — agagg@pareto.co.uk | Direct Tel: 07551 258 279

Urgent Contact Details & Reporting Channels:

- **Urgent Safeguarding Phone Line:** 01625 810643
- **Central Safeguarding & EDI Email:** safeguarding@pareto.co.uk (monitored continuously during operating hours)
- **Online Reporting Form:** Accessible via the Pareto Learner Portal and corporate website.
  IMMEDIATE DANGER: If you believe a learner or staff member is in immediate physical danger, facing an active threat, or requires urgent medical attention, you MUST call **999** immediately, and then report the incident to the Pareto DSL as soon as it is safe to do so.

5. Roles and Responsibilities

- **Governance Board & Senior Leadership Team (SLT):**
  - Hold strategic accountability for ensuring Pareto's safeguarding, Prevent, and EDI policies are effective, fully resourced, and compliant with statutory requirements.
  - Appoint a senior board-level lead for safeguarding and EDI, ensuring regular audit scrutiny.
  - Lead from the front, fostering an inclusive, anti-discriminatory culture where staff and learners feel safe to speak out.
- **Designated Safeguarding Lead (DSL) & Deputy DSLs:**
  - Take lead responsibility for child protection, adult safeguarding, online safety, filtering and monitoring oversight, receiving Operation Encompass notifications, and managing LADO referrals.
  - Maintain Level 4 (DSL) and Level 3 (DDSL) safeguarding qualifications, updated formally every two years, with annual statutory knowledge refreshes.
  - Ensure robust cover arrangements exist during DSL absence via a shared, confidential triage inbox (safeguarding@pareto.co.uk).

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- **All Staff (Skills Coaches, Trainers, Assessor & Operational Teams):**
  - Maintain an attitude of *"it could happen here"* at all times.
  - Complete mandatory annual safeguarding, Prevent, and EDI e-learning (including Education and Training Foundation modules).
  - Be vigilant for indicators of abuse, radicalisation, neglect, or discrimination, applying professional curiosity and reporting all concerns immediately.

- **Employers and Workplace Mentors:**
  - Serve as essential partners in apprentice welfare, providing safe, inclusive, and harassment-free working environments.
  - Ensure appropriate DBS checks are in place for staff supervising apprentices aged 16–18, and cooperate with Pareto during joint reviews, risk assessments, or safeguarding enquiries.

6. The Prevent Duty and Countering Radicalisation

Pareto fulfills its statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to prevent people from being drawn into terrorism. Our Prevent strategy is fully integrated into the UK Government's CONTEST strategy and the updated *Prevent Duty Guidance*.

6.1 Operational Prevent Framework

1. **Notice, Check, Share:** Staff must apply this framework when identifying changes in behaviour, radicalisation indicators, or exposure to violent extremist narratives.
2. **Security Threat Check (STC):** Strategic decision-making and curriculum design are guided by the STC principles: assessing local threat pictures, ensuring proportionate responses, and actively reducing permissive environments for extremist ideologies.
3. **Prevent National Referral Form (NRF):** All Prevent concerns must be reported immediately to the DSL. Onward referrals to Counter-Terrorism Policing are submitted using the standardised NRF.
4. **Police PAF & Channel Panel:** Referrals undergo a police Prevent Assessment Framework (PAF) triage. Suitable cases progress to the Local Authority-led multi-agency Channel panel for voluntary, consent-based mentoring and support. If Channel is declined or unsuitable, risk is managed via Police-Led Partnerships (PLP).
5. **Threat Awareness:** Staff receive training across all threat vectors: Islamist terrorism, Extreme Right-Wing ideologies, mixed/unclear/fluctuating ideologies, AI-driven online grooming, and fascination with mass-casualty violence.

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6.2 Fundamental British Values and EDI Synergy

We actively promote the four Fundamental British Values throughout our curriculum, tutorials, and employer interactions:

- **Democracy:** Encouraging voice, debate, representation, and peer feedback.
- **The Rule of Law:** Understanding legal rights, workplace legislation, Equality Act protections, and human rights.
- **Individual Liberty:** Fostering self-belief, personal freedom, privacy, and freedom of expression within safe legal boundaries.
- **Mutual Respect and Tolerance:** Celebrating diverse faiths, beliefs, cultures, and protected characteristics, directly supporting our EDI goals.

7. Recognising Signs of Abuse, Neglect, and Prejudice-Based Harm

Staff must be alert to indicators of harm arising within the family, workplace, community, or online environments.

7.1 Core Statutory Categories of Abuse

- **Physical Abuse:** Hitting, shaking, scalding, force, or fabricated/induced illness.
- **Emotional Abuse:** Persistent criticism, humiliation, belittling, deliberate isolation, cyberbullying, or witnessing domestic violence.
- **Sexual Abuse:** Non-consensual sexual activity, penetration, touching, grooming, or exposure to explicit content.
- **Neglect:** Persistent failure to meet basic physical, emotional, or psychological needs, leading to severe impairment of health or development.

7.2 Specific Safeguarding Risks and Harm Vectors

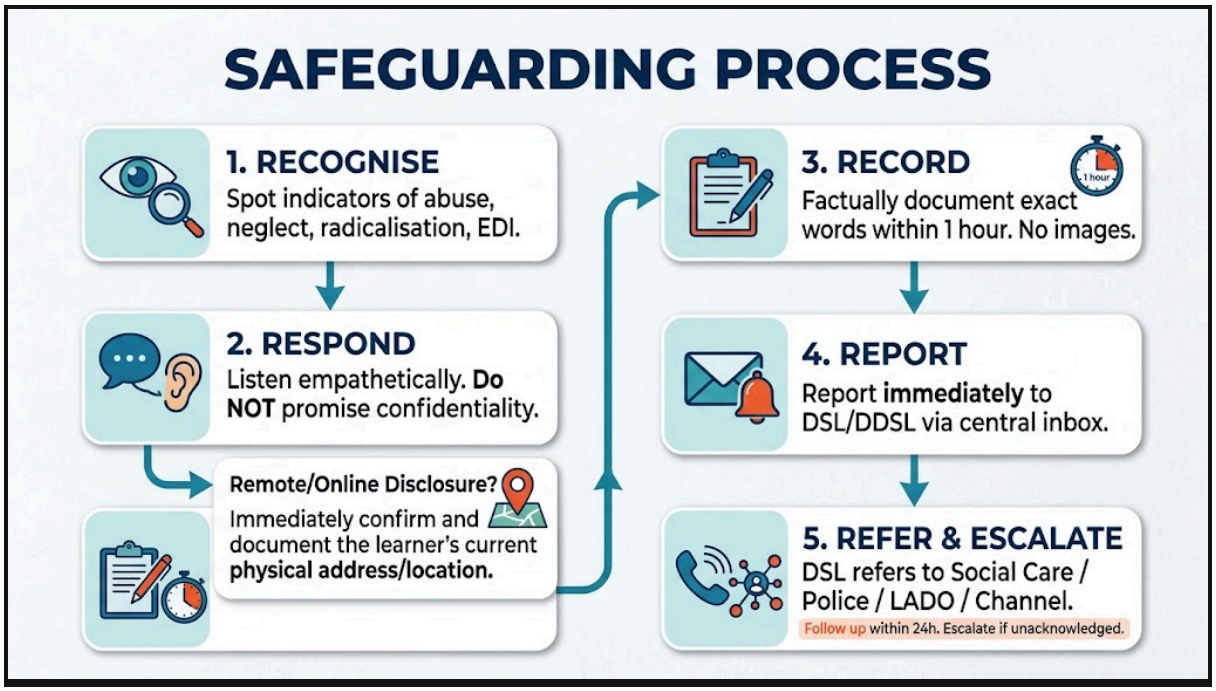
- **Online Harms, Generative AI & Deepfakes:** Inappropriate content, grooming, non-consensual sharing of intimate images, AI-generated nudes/semi-nudes, deep fakes, and misogynistic influencers. Learners are signposted to the Childline/IWF *'Report Remove'* digital tool.
- **Child-on-Child Abuse:** Zero-tolerance approach to abuse between peers. Sexual harassment, sexual violence, misogyny/misandry, upskirting (criminal offence under the *Voyeurism (Offences) Act 2019*), or hazing MUST NEVER be dismissed as "banter", "just a laugh", or "boys being boys".
- **Child Criminal Exploitation (CCE) & County Lines:** Coercion into drug transport, deal lines, plugging, cuckooing, trap houses, or debt bondage. Demands immediate child protection and National Referral Mechanism (NRM) referrals.

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- **Prejudice-Based Harm and Hate-Related Bullying:** Targeting individuals based on protected characteristics (Race, Religion/Belief, Sex, Disability, Sexual Orientation, Gender Reassignment, Age, Marriage/Civil Partnership, Pregnancy/Maternity).
- **Domestic Abuse & Teenage Relationship Abuse:** Coercive, controlling, threatening, or violent behaviour in family or intimate personal relationships.
- **Female Genital Mutilation (FGM), Forced Marriage & 'Honour-Based' Abuse:** Mandatory reporting applies to FGM.
- **Mental Health & Wellbeing Risks:** Anxiety, depression, severe self-harm, eating disorders, or suicidal ideation.

8. Reporting Procedures: The 5 Rs and Escalation Pathway

Do NOT investigate concerns yourself. Staff must report concerns immediately using the **5 Rs Framework**:



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1. **RECOGNISE:** Identify physical, behavioural, or digital indicators of harm, distress, radicalisation, or discriminatory treatment.
2. **RESPOND:** Listen calmly and attentively. Reassure the victim that they are being taken seriously. Never promise confidentiality; explain that information must be shared to keep them safe.
3. **RECORD:** Log complete factual details on Pareto's secure reporting system within 1 hour. Use the learner's exact words. Record dates, times, locations, and witnesses. **CRITICAL:** Staff must NEVER view, capture, hold, or forward illegal or explicit digital images of children/learners on any device.
4. **REPORT:** Submit the record immediately to the DSL or Deputy DSLs. Allegations against staff must be reported directly to the VP Apprenticeships (or Chair of Governance if against the VP).

5. **REFER & ESCALATE:**
   - **Children's Social Care / MASH:** DSL refers any urgent child protection concerns within 24 hours. If Social Care does not acknowledge receipt within 1 working day, the DSL must follow up immediately.
   - **LADO:** Staff allegations meeting the harm threshold must be referred to the Local Authority Designated Officer within 24 hours.
   - **Police:** Call 999 for immediate threats; 101 for non-urgent crimes or mandatory FGM reports.
   - **Formal Escalation:** If statutory agency responses are delayed, inadequate, or rejected despite ongoing risk, Pareto staff will activate the formal multi-agency escalation pathway.

9. Online Safety, AI, and Accessibility

Pareto's online delivery infrastructure complies with DfE Filtering and Monitoring Standards, structured around the **4 Cs of Online Risk**:

- **Content:** Protecting learners from illegal, radicalising, misogynistic, racist, or self-harm content, deep fakes, and AI-generated imagery.
- **Contact:** Preventing grooming, commercial exploitation, or unwanted contact by adults or peers.
- **Conduct:** Preventing cyberbullying, non-consensual image sharing, hate speech, and online sexual harassment.
- **Commerce:** Safeguarding against online financial scams, phishing, and gambling risks.

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9.1 Secure Remote Infrastructure & IT System Management (Zscaler Zero Trust Architecture)

9.2.1 Scope and Technical Delivery Context

Pareto recognises that apprentices participate in virtual training from diverse environments, including home Wi-Fi networks, public locations, and employer premises, using a combination of Pareto-issued, employer-owned, and personal (BYOD) devices. To ensure a safe, resilient, and compliant digital environment that aligns with DfE Filtering and Monitoring Standards and the 4 Cs of Online Risk, Pareto deploys a cloud-native Zscaler Zero Trust Exchange platform.

This architecture decouples application access from network access, enforcing strict identity-based perimeter security that protects learners, corporate employer environments, and Pareto's digital systems without requiring intrusive software installations on third-party hardware.

9.1 Secure Remote Infrastructure & IT System Management

9.1.1 Scope and Technical Delivery Context

Pareto utilises the cloud-native **Zscaler Zero Trust Exchange**™ platform to secure virtual learning environments, maintain operational resilience, and align with **DfE Filtering and Monitoring Standards** and the **4 Cs of Online Risk**. Delivery is configured across distinct user categories and environments:

- **Pareto Staff:** Corporate staff hold @pareto.co.uk identities and operate managed devices running the **Zscaler Client Connector** application. Traffic is routed through encrypted Tunnel 2.0 (DTLS/TLS over outbound Port 443) on both trusted and off-trusted networks.
- **Learners (Remote / Virtual Learning):** Apprentices attend virtual sessions from home or employer networks using personal (BYOD) or employer-owned devices. Learners do not receive @pareto.co.uk email accounts. Instead, they connect via **agentless, clientless browser sessions** to access learning portals and assessment environments without software installation on non-Pareto hardware.
- **Learners (On Pareto Premises):** When attending training on-site at Pareto facilities, learners connect via a dedicated **Pareto Guest Wi-Fi Network**. Internet traffic on this network is protected and filtered by Zscaler to ensure compliance and prevent access to prohibited content.

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9.1.2 Core Cybersecurity & Safeguarding Mechanisms

- **Cloud-Native Web Filtering & Threat Protection (Zscaler Internet Access - ZIA):**
  - **Inline Inspection & Network Safeguarding:** Inspects web traffic and encrypted web streams (Port 443) across managed staff endpoints and the Guest Wi-Fi network to block malware, phishing, and malicious scripts.
  - **Dynamic Content Filtering:** Enforces strict content controls aligned with **KCSIE** and **Prevent Duty** requirements. Access to illegal material, extreme or radicalising content, adult media, gambling, and harmful domains is automatically blocked.
  - **Safe Search & AI Controls:** Enforces SafeSearch on search platforms and restricts access to unvetted Generative AI tools during learning sessions to prevent accidental exposure or upload of sensitive learner data.
- **Micro-Segmented & Agentless Access Control (Zscaler Private Access - ZPA):**
  - **Least-Privilege Isolation:** Learners access strictly the specific virtual classrooms, learning portals, and assessment platforms required for their module. External learner traffic is fully micro-segmented and isolated from Pareto's internal corporate network, preventing lateral threat movement.
  - **Clientless BYOD Access:** Personal and employer-managed devices access Pareto learning platforms using browser-based tunnels. This respects employer IT policies and learner personal privacy by avoiding agent installation on third-party hardware.
- **Employer Network Interoperability:**
  - **Standard Outbound Port Compatibility:** All session traffic utilises standard outbound web ports (HTTPS/DTLS Port 443). Learners attending virtual training from their employer's workplace can join without triggering corporate firewall blocks or requiring employer IT teams to open risky inbound ports.
- **Digital Performance & Session Quality Monitoring (Zscaler Digital Experience - ZDX):**
  - **Telemetry & Quality Assurance:** Telemetry isolates network, ISP, or application latency during live virtual delivery sessions. Integrated diagnostic tools enable IT support to resolve connectivity or stream quality issues without inspecting personal files or private user data.

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9.1.3 Data Protection and Privacy:

- **Data Loss Prevention (DLP):** Controls prevent unauthorised transfer, download, or exfiltration of learner personally identifiable information (PII), assessment evidence, or safeguarding records onto unmanaged devices, adhering to **UK GDPR** and the **Data (Use and Access) Act 2025**.
- **Identity & Lifecycle Governance:** Staff access permissions synchronise directly with Pareto's central Identity Provider (IDP). Learner access to learning management platforms is provisioned for active enrollments and revoked upon course completion, withdrawal, or break in learning.
- **Separation of Personal Data:** Zscaler security controls inspect web traffic associated exclusively with Pareto learning sessions, managed staff endpoints, and the Pareto Guest Wi-Fi network. Non-learning activities and private personal traffic outside scheduled sessions remain unmonitored.

10. Safer Recruitment, Continuous Screening, and Workforce Equity

10.1 Safer Recruitment Framework

Pareto enforces mandatory safer recruitment under *KCSIE 2026 Part 3* to ensure unsuitable individuals are identified and deterred:

1. **Application & Shortlisting:** Application forms require full employment histories and references. Shortlisting is performed by at least two trained staff members. Shortlisted candidates undergo online due diligence searches to identify any public suitability issues.

2. **Pre-Appointment Vetting Checks:** Before employment confirmation, Pareto completes:
   - Identity verification (checking original birth certificates where available).
   - Right to Work in the UK verification.
   - Enhanced DBS check with Children's Barred List check for any role or volunteer position that meets the statutory definition of Regulated Activity (should such a role be required).
   - Section 128 management direction checks for senior leaders, managers, and Governance Board members.
   - Prohibition from Teaching checks.
   - Overseas criminal and regulatory checks for applicants who have lived/worked abroad.
   - Direct written references from current/last employers.

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10.2 Overview of Delivery Model & Regulated Activity Status

Under the current standard apprenticeship delivery model, Pareto staff roles do not meet the statutory definition of 'regulated activity' for either young adults (16–18) or adult learners. However, protocols for regulated activity are maintained within this policy to govern specific exceptions (such as qualifying volunteer roles) and to ensure immediate compliance should delivery models evolve.

The current apprenticeship delivery model operates under the following structured parameters and statutory exemptions:

- **Group-Based Training:** Training is delivered in group settings to adults and young adults aged 16–18 enrolled on an apprenticeship programme. These occur approximately every 4–6 weeks.

- **Online Individual Interactions:** All individual Skills Coach and Learner interactions, including one-to-one coaching and progress reviews, are conducted online approximately once every four weeks. All online progress reviews and coaching sessions are transcribed and/or recorded for compliance, quality monitoring, and safeguarding oversight.

Statutory Exemption for Young Adults (16–18 cohort): Under the Safeguarding Vulnerable Groups Act 2006 (as amended), teaching, training, or instructing under-18s is only classed as regulated activity if it meets the statutory "period condition" (occurring once a week or more, or on 4 or more days in a 30-day period). Because learner contact at Pareto involves a maximum of two interactions in any 30-day window (one coaching session and one training session), it falls significantly below the frequency threshold and is therefore not regulated activity.

Statutory Exemption for Adults (18+ cohort): Regulated activity relating to adults is defined strictly by the nature of the activity provided (e.g., providing healthcare, personal care, social work, or assistance with cash/bills), rather than contact frequency. Delivering apprenticeship training, coaching, and progress reviews does not fall into any of these statutory care or social work categories, meaning staff interactions with adult apprentices do not constitute regulated activity.

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10.3 Disclosure and Barring Service (DBS) Vetting Adjustments

As staff members do not engage in regulated activity under the current delivery model:

1. **Retention of Regulated Activity Provisions:** References to, and protocols for, "regulated activity" remain a permanent feature within this policy. This retention ensures that any future modifications, expansions, or restructuring of Pareto's delivery models will automatically trigger an immediate risk assessment and the implementation of the corresponding, appropriate vetting processes.

10.4 Continuous Screening

Pareto staff are strongly encouraged to register with the DBS Update Service within the 30-day window following the issue of their Enhanced Certificate where applicable. To support this, Pareto will reimburse the annual subscription fee for all active staff.

- **Staff on the Update Service:** By registering, staff consent to Pareto carrying out periodic status checks. These checks will be conducted and logged on our Single Central Record on an annual basis.
- **Staff NOT on the Update Service:** Where a staff member has chosen not to register, Pareto carries out a new Enhanced DBS check every two years (or sooner if concerns arise). Pareto covers all mandatory vetting costs.
- **Lapsed Update Service Subscriptions:** Where a member of staff allows their DBS Update Service subscription or annual renewal to lapse, they automatically default to Year 2 of Pareto's 2-year manual DBS update cycle. Consequently, a new Enhanced DBS check must be applied for within 12 months of the lapse date (or immediately if required by role risk assessment), and the employee will be required to re-register the new certificate with the Update Service within the statutory 30-day window.
- **Volunteers:** In accordance with the *Crime and Policing Act 2026*, any volunteer engaged in teaching, training, instructing, or supervising learners frequently (more than 3 days in a 30-day period) or overnight is in Regulated Activity and MUST undergo an Enhanced DBS check with Children's Barred List check prior to commencement. Unchecked volunteers will never be left unsupervised.

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11. Data Protection, Confidentiality, and Learners' Rights

Pareto processes personal data strictly under Data Protection Laws (Data Protection Act 2018, UK GDPR, and the Data (Use and Access) Act 2025).

- **Safeguarding Data Processing:** Data protection legislation is not a barrier to sharing information necessary to keep learners safe. Under UK GDPR Article 6(1)(e)/(c) and Schedule 1 Part 2 of the Data Protection Act 2018 (*'safeguarding of children and individuals at risk'*), special category personal data can be processed and shared without consent where seeking consent would place a learner at risk or is contextually inappropriate.
- **Right to Erasure Limitations:** Under UK GDPR Article 17(1)(g) (inserted by the *Victims and Prisoners Act 2024*), victims of stalking/harassment may request erasure of personal data resulting from unfounded malicious allegations, subject to formal review. Safeguarding records required for statutory compliance are exempt from general erasure requests.

12. Allegations Against Staff and Low-Level Concerns Governance

All safeguarding concerns or allegations regarding staff, contractors, or volunteers will be managed strictly under *KCSIE 2026 Part 4* and *Working Together 2026* Chapter 4:

12.1 Harm Threshold Allegations (Section One)

Where an adult working for Pareto has:

- Harmed a learner or posed a risk of harm;
- Committed a criminal offence against/related to a child/learner; or
- Behaved in a way indicating unsuitability to work with learners (including transferable risk outside work):

The Case Manager (VP Apprenticeships / Chair of Governance) will notify the LADO within 24 hours and prior to interviewing the employee. Suspension is not an automatic response and alternative duties will be considered. If an employee resigns, the investigation continues to a formal conclusion. Compromise or settlement agreements that bypass LADO, DBS, or TRA reporting are strictly prohibited.

If an individual in regulated activity is dismissed, removed, or resigns due to safeguarding harm/risk, Pareto has a mandatory statutory duty to refer them to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA).

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13. Whistleblowing and Speaking Up Culture

Pareto promotes a culture of psychological safety where staff, learners, and employers feel empowered to raise concerns regarding unsafe practice, misconduct, or safeguarding failures.

- **Internal Reporting:** Concerns can be reported directly to the DSL, SLT, or via the Randstad Whistleblowing Channel.
- **External Reporting:** Where a staff member feels unable to raise a concern internally, or feels genuine concerns are not being acted upon, they should contact the **NSPCC Whistleblowing Advice Line** on 0800 028 0285 or email help@nspcc.org.uk.

14. Management of External Speakers, Events, and Inclusivity

To comply with the Prevent Duty and our EDI Policy, Pareto enforces strict due diligence protocols for all external speakers, guest lecturers, or events:

- External speakers must be approved in advance by the DSL / Quality Team.
- Speakers must agree to Pareto's Speaker Code of Conduct, prohibiting extremist narratives, anti-establishment hate speech, misogyny, or discrimination.
- All in-person and digital event venues must be fully accessible to learners with SEND, maintaining equal access and dignity.

15. Reporting Serious Incidents and Statutory Mandatory Duties

The DSL and SLT will immediately notify Ofsted, the Department for Education (DfE), and the local Child Safeguarding Practice Review Panel of any serious safeguarding incidents, serious injuries, or allegations against staff.

Statutory Mandatory Reporting Duties:

1. **Female Genital Mutilation (FGM):** Under Section 5B of the *Female Genital Mutilation Act 2003*, teachers/trainers who discover that an act of FGM appears to have been carried out on a female under 18 MUST personally report the matter directly to the Police (999/101).
2. **Mandatory DBS Referral:** Statutory duty under Section 35 of the *Safeguarding Vulnerable Groups Act 2006* to refer an individual to the DBS within 14 days if removed/resigned due to safeguarding harm.
3. **Mandatory TRA Referral:** Statutory duty under Sections 141D/E of the *Education Act 2002* to refer teachers/trainers to the Teaching Regulation Agency for serious misconduct.

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16. Policy Review and Continuous Improvement

This policy is reviewed annually by the Designated Safeguarding Lead and approved by the Governance Board. Reviews incorporate learning from serious case reviews, internal safeguarding audits, learner/employer feedback, and EDI data analysis to drive continuous improvement.

17. Low-Level Concerns

17.1 Purpose and Ethos

Pareto is committed to creating an open, transparent, and accountable culture where all concerns regarding adults working in or on behalf of the company are shared responsibly, recorded factually, and addressed promptly. Early identification of low-level concerns minimises safeguarding risks and reinforces professional boundaries.

17.2 Definition of a Low-Level Concern

A 'low-level concern' is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt', that an adult working for or on behalf of Pareto may have acted in a way that:

- Is inconsistent with the Pareto Staff Code of Conduct (including inappropriate conduct outside of work); and
- Does not meet the harm threshold set out in Section 12 (Allegations Against Staff) and is not serious enough to warrant a referral to the LADO.

Examples include, but are not limited to:

- Being over friendly with learners or displaying favoritism;
- Taking photographs of learners on personal mobile phones or devices;
- Engaging with a learner on a one-to-one basis in a secluded area or behind closed doors without operational justification;
- Communicating with learners via personal social media or unapproved messaging applications;
- Using inappropriate, patronising, or discriminatory language.

17.3 Reporting, Recording, and Escalation

- All low-level concerns must be reported verbally or in writing to the DSL or Deputy DSLs. Staff are encouraged to self-refer if they feel a situation was compromised.
- Low-level concerns will be recorded confidentially on Pareto's secure reporting system.
- The DSL will review low-level records periodically to identify cumulative patterns. If a pattern emerges, or if a concern crosses the harm threshold, it will be escalated immediately to the LADO under Section 12. Low-level concerns will not be included in employment references unless they relate to substantiated misconduct or poor performance.

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18. Policy on Supporting Learners Questioning Their Gender and Requests for Social Transition

18.1 Statutory Context and Core Principles

Pareto adheres strictly to statutory guidance in *KCSIE 2026* (Paragraphs 254–284) when responding to learners questioning their gender or requesting support with social transition. Pareto maintains a respectful environment where bullying, discrimination, and harassment are never tolerated, while ensuring all decisions are grounded in learner welfare, safeguarding legislation, and the *Equality Act 2010*.

18.2 Responsive Approach and Parental Involvement

- Pareto staff will not initiate any action regarding social transition. This policy applies strictly when a learner or their parent/carer explicitly raises a request for social transition.
- Staff must not adopt informal name/pronoun changes without formal review and approval by the DSL and SLT.
- **Parental Involvement:** Parents and carers hold the primary role in their children's lives. Where a learner under 18 requests social transition support, Pareto will engage parents/carers as a priority, giving great weight to their views. If involving parents poses a demonstrable risk of significant harm to the learner, the DSL will determine appropriate safeguarding action before contacting parents.
- **Primary-Aged / Pre-Pubertal Caution:** Particular caution is exercised regarding young learners, noting Cass Review findings regarding early social transition. Staff will not provide clinical advice.

18.3 Premises, Facilities, and Sports

- **Single-Sex Facilities:** Learners must not be permitted into single-sex toilets, changing rooms, or residential accommodation designated for the opposite biological sex. No exceptions are permitted.
- **Alternative Provisions:** Where a gender-questioning learner does not wish to use facilities designated for their biological sex, Pareto will provide alternative, lockable individual facilities (e.g., self-contained unisex toilets) without compromising single-sex provision or the dignity and privacy of others.

18.4 Record-Keeping and Support for Detransition

Biological sex is recorded accurately in administrative registers. All transition requests and assessments will be formally documented. Should a learner request to reverse a previous transition ("detransition"), Pareto will work supportively alongside parents/carers and external specialists to provide flexible, compassionate support.

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19. Single Central Record (SCR) and Workforce Vetting

19.1 Statutory SCR Requirement

Pareto maintains a centralised, electronic Single Central Record (SCR) of pre-appointment vetting checks in strict compliance with *KCSIE 2026* (Paragraphs 347–357). The SCR covers all employed staff, Skills Coaches, trainers, salaried teacher trainees, agency/supply staff, contractors, volunteers (including those in regulated activity, where applicable), and Governance Board members..

19.2 Mandatory SCR Data Fields

The SCR records the following verification checks, including check dates and verifying officer details:

1. Identity Verification (including original birth certificate check where available).
2. Standalone Children's Barred List Check (prior to deployment in regulated activity).
3. Enhanced DBS or Basic DBS Certificate number and issue date (with Barred List status recorded only for roles specifically legally eligible for it, such as qualifying volunteers in regulated activity).
4. DBS Update Service consent and annual status check dates.
5. Prohibition from Teaching.
6. Section 128 Management Check for senior leaders, managers, and Board members.
7. Right to Work in the UK.
8. Professional Qualification verification (where a specific qualification is a requirement of the role).
9. Overseas Criminal & Regulatory Checks for candidates with international history.
10. Agency Written Confirmations verifying supply staff checks.

19.3 Oversight and Document Retention

The SCR is access-protected and audited monthly by the DSL.

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20. Operation Encompass and Statutory Domestic Abuse Notification

20.1 Statutory Framework

Under Section 20 of the *Victims and Prisoners Act 2024* (inserting Section 49A into Part 3 of the *Domestic Abuse Act 2021*), police forces are under a statutory duty to operate **Operation Encompass**. This requires police forces to notify educational settings whenever a young person under 18 has been involved in, present at, or exposed to domestic abuse.

20.2 Operational Protocol

1. **Receiving Notifications:** Encompass notifications sent by police forces are received directly by the DSL or trained Deputy DSLs ("Key Adults").
2. **Immediate Pastoral Response:** Upon receipt of an Encompass notification prior to the start of the learning day, Key Adults provide subtle, trauma-informed pastoral support to the learner. This includes flexible learning adjustments and check-ins without requiring the learner to repeat details of the trauma.
3. **CP File Integration:** Notifications are logged within the learner's confidential Child Protection file, informing ongoing Family Help assessments under *Working Together 2026* or referrals to Children's Social Care.

21. Embedding Equity, Diversity, and Inclusion Across the Apprenticeship Journey

In accordance with our EDI Policy (v4, 2026), Pareto embeds equity, diversity, and inclusion into every operational phase:

21.1 Inclusive Recruitment and Admissions

- Selection criteria and entry assessments are transparent, fair, and free from bias.
- We use inclusive imagery and language in all marketing to attract diverse talent pools.
- Applicants declaring disabilities, neurodivergence, or health conditions receive proactive pre-entry consultations to arrange reasonable adjustments.

21.2 Inclusive Curriculum, Teaching, and Assessment

- Coaching, teaching, and assessment methods are adapted to accommodate diverse learning styles and neurodivergent profiles.
- Diverse perspectives, EDI concepts, Prevent awareness, and British Values are embedded throughout apprenticeship modules.
- Digital learning platforms and materials are designed to meet accessibility standards.

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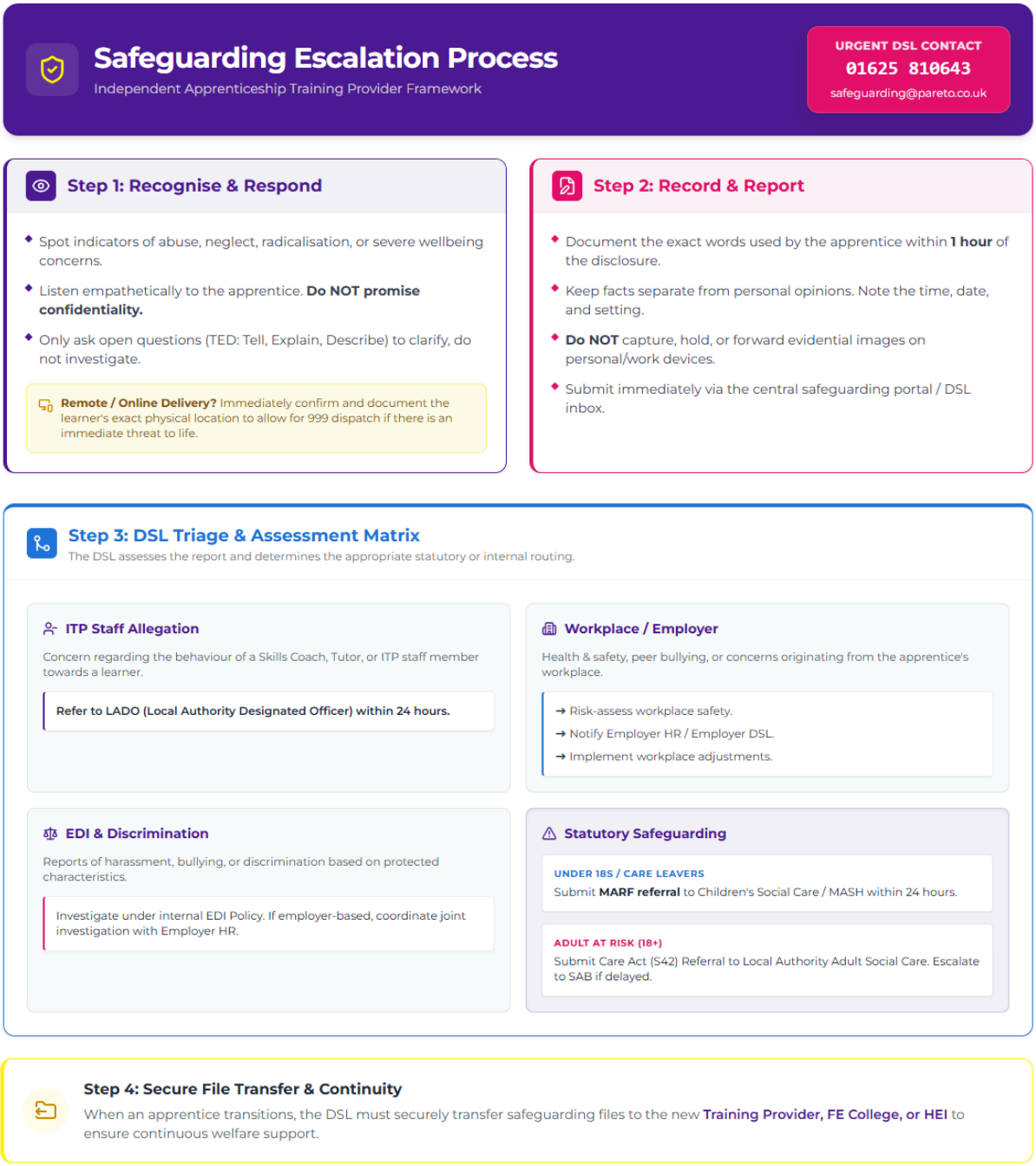
21.3 Proactive Learning Support and Reasonable Adjustments

- In alignment with our *Reasonable Adjustments* and *Learning Support Policy*, Pareto proactively identifies learner needs at enrolment.
- We implement reasonable adjustments for learning sessions, mock assessments, and End-Point Assessment (EPA) to remove barriers for disabled learners.

21.4 Zero-Tolerance to Discrimination, Harassment, and Bullying

- Pareto enforces a strict zero-tolerance policy against direct discrimination, indirect discrimination, harassment, victimisation, and microaggressions.
- Any report of discrimination or harassment will be investigated promptly and sensitively under our 5 Rs framework, with dedicated pastoral support provided to the complainant.

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Policy Owner:

Anne Hill

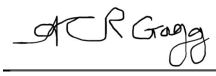


Anne Hill (Nov 3, 2026, 12:01pm)

03 Nov 2026

Policy Owner:

Anna Gagg

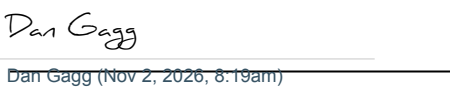


Anna Gagg (Nov 3, 2026, 3:16pm)

03 Nov 2026

Policy Authority:

Dan Gagg



Dan Gagg (Nov 2, 2026, 8:19am)

02 Nov 2026

Company number: 03119895
Registered office address: 450 Capability Green, Luton, Bedfordshire, United Kingdom, LU1 3LU

Signable

Issuer	Pareto Law Ltd
Document generated	Mon, 2nd Nov 2026 8:15:12 GMT
Document fingerprint	6895bdcd2d3bf715757c8250f8e4c85f

Parties involved with this document

Document processed	Party + Fingerprint
Mon, 2nd Nov 2026 8:19:40 GMT	Dan Gagg - Signer (208bc0524d16fe0b7569e773220b4af2)
Tue, 3rd Nov 2026 12:01:31 GMT	Anne Hill - Signer (11bd62c8b00b1d4daad20d8d3580b85f)
Tue, 3rd Nov 2026 15:16:04 GMT	Anna Gagg - Signer (fdd9a321e3382011eae5a19e06f4ee0b)

Audit history log

Date	Action
Mon, 2nd Nov 2026 8:15:12 GMT	Envelope generated with fingerprint 3d34e4a7581e055f2cc302a5c4db922c by dgagg@pareto.co.uk (2.122.132.129)
Mon, 2nd Nov 2026 8:15:12 GMT	Document generated with fingerprint 6895bdcd2d3bf715757c8250f8e4c85f (2.122.132.129)
Mon, 2nd Nov 2026 8:16:10 GMT	Dan Gagg has been assigned to this envelope. (2.122.132.129)
Mon, 2nd Nov 2026 8:16:10 GMT	Anne Hill has been assigned to this envelope. (2.122.132.129)
Mon, 2nd Nov 2026 8:16:10 GMT	Anna Gagg has been assigned to this envelope. (2.122.132.129)
Mon, 2nd Nov 2026 8:17:35 GMT	Sent the envelope to Dan Gagg (dgagg@pareto.co.uk) for signing (2.122.132.129)
Mon, 2nd Nov 2026 8:17:35 GMT	Document emailed to dgagg@pareto.co.uk
Mon, 2nd Nov 2026 8:17:42 GMT	Dan Gagg opened the document email. (142.250.32.42)
Mon, 2nd Nov 2026 8:17:44 GMT	Dan Gagg opened the document email. (142.250.32.32)
Mon, 2nd Nov 2026 8:19:21 GMT	Dan Gagg viewed the envelope (2.122.132.129)
Mon, 2nd Nov 2026 8:19:40 GMT	Dan Gagg signed the envelope (2.122.132.129)
Mon, 2nd Nov 2026 8:19:41 GMT	Sent the envelope to Anne Hill (ahill@pareto.co.uk) for signing (2.122.132.129)
Mon, 2nd Nov 2026 8:19:41 GMT	Document emailed to ahill@pareto.co.uk
Mon, 2nd Nov 2026 8:19:58 GMT	Anne Hill opened the document email. (142.250.32.42)
Mon, 2nd Nov 2026 8:31:32 GMT	Anne Hill opened the document email. (142.250.32.35)
Tue, 3rd Nov 2026 11:59:02 GMT	Anne Hill opened the document email. (142.250.32.32)
Tue, 3rd Nov 2026 11:59:20 GMT	Anne Hill viewed the envelope (94.0.130.212)

Tue, 3rd Nov 2026 12:00:54 GMT	Sent Anne Hill a reminder to sign the document. (2.122.132.129)
Tue, 3rd Nov 2026 12:00:54 GMT	Document emailed to ahill@pareto.co.uk
Tue, 3rd Nov 2026 12:01:31 GMT	Anne Hill signed the envelope (94.0.130.212)
Tue, 3rd Nov 2026 12:01:31 GMT	Sent the envelope to Anna Gagg (agagg@pareto.co.uk) for signing (94.0.130.212)
Tue, 3rd Nov 2026 12:01:31 GMT	Document emailed to agagg@pareto.co.uk
Tue, 3rd Nov 2026 12:01:44 GMT	Anna Gagg opened the document email. (142.250.32.35)
Tue, 3rd Nov 2026 14:20:47 GMT	Anna Gagg opened the document email. (142.250.32.42)
Tue, 3rd Nov 2026 14:20:53 GMT	Anna Gagg viewed the envelope (2.122.132.129)
Tue, 3rd Nov 2026 15:16:04 GMT	Anna Gagg signed the envelope (2.122.132.129)
Tue, 3rd Nov 2026 15:16:04 GMT	This envelope has been signed by all parties (2.122.132.129)
Tue, 3rd Nov 2026 15:16:04 GMT	Signed document confirmation emailed to dgagg@pareto.co.uk (2.122.132.129)
Tue, 3rd Nov 2026 15:16:04 GMT	Signed document confirmation emailed to ahill@pareto.co.uk (2.122.132.129)
Tue, 3rd Nov 2026 15:16:04 GMT	Signed document confirmation emailed to agagg@pareto.co.uk (2.122.132.129)
Tue, 3rd Nov 2026 15:16:04 GMT	Signed document confirmation emails have been sent to all parties (2.122.132.129)