

Policy Title:	Safeguarding Policy
Description:	Safeguarding our riders, staff and vulnerable groups who come in to contact with Zeelo and UK group companies.
Effective Date:	March 21 st 2024
Approved by:	Sam Ryan
Responsible Employee:	Director UK Operations

Mission Statement

At Zeelo we believe that safeguarding children and vulnerable adults is a shared responsibility. Zeelo work together and do everything in our power to ensure children and vulnerable adults who come into contact with Zeelo, in any capacity, are safeguarded.

Definitions

School – For the purpose of this policy, the school is a customer who operates within regulated such as FE Colleges, Schools and Universities

Contractor – Refers to Zeelo’s selected coach and bus operators

Fast Pod – Fast Pod is Zeelo’s Senior Leadership Team

Zeelo – Zeelo Limited and any wholly owned subsidiaries

This policy applies to all those who work for and with Zeelo (including its UK group companies) in any capacity and is based on the following principles:

- the welfare of the child/vulnerable adult is paramount
- a child is anyone under the age of 18
- all children/vulnerable adults, regardless of age, ability, gender, racial heritage, religious belief, sexual orientation, culture or identity, have a right to equal protection from all types of harm or abuse
- any safeguarding concern or allegation of abuse will be taken seriously by Zeelo and responded to appropriately. Zeelo recognises this may require a referral to the independent Local Authority Designated Officer (LADO) if an allegation has been made against a bus driver
- we have a commitment to safer recruitment, selection and vetting that include checks into the eligibility and the suitability of all our staff, the coach operators we contract to and their drivers

This policy will be shared with clients with whom we have contracts, all our contractors and can be shared with riders and parent/guardians, at their request.

The safeguarding policy should be read in conjunction with all other relevant policies and procedures – available upon request.

If you are unsure what this policy means, or how it relates to you, please contact the Designated Safeguarding Lead.

The purpose of this policy is to:

- protect children and vulnerable adults
- inform all staff and those we work with of our overarching principles and procedures that guide our approach to safeguarding

Scope of the Policy

Zeelo recognises the importance of safeguarding in the work we do and fully understand our responsibilities.

We have no governing body that sets out requirements of our industry in terms of safeguarding. We want to provide the gold-standard in safeguarding in our industry. We choose to operate to the highest standards.

This policy has been developed in accordance with the principles established by the relevant legislation and statutory guidance, including but not limited to the Children Act 1989 and 2004, the Care Act, 2014, Working Together to Safeguard Children 2023, Keeping Children Safe in Education 2023, the Rehabilitation of Offenders' Act 1974 and General Data Protection Regulation, 2018.

We will treat any breach of this policy very seriously. For those who work for us, failure to follow this policy could lead to disciplinary action, which may ultimately result in dismissal. For those who work with us, we reserve the right to immediately terminate your contract.

Code of Conduct

We expect all staff and all those who work with us, including and most particularly school bus drivers to behave appropriately at all times.

No member of staff, or school bus driver will ever befriend a child outside of their professional role. They will never share, or accept, personal details, become friends with a child on social media, take photographs of a child, or meet them outside of their school bus role.

No member of staff, or school bus driver will ever guarantee confidentiality to a child and if they ever have concerns about a child the member of staff will speak to the designated safeguarding lead. A school bus driver would speak to their coach operator, who in turn would speak to the designated safeguarding lead at Zeelo.

Safeguarding Roles at Zeelo

All those who work for or with Zeelo share the responsibility for safeguarding children and vulnerable adults but there are individuals within the company with specific safeguarding responsibilities.

Designated Safeguarding Lead:

David Biszby, Director UK Operations
David.biszby@zeelo.co

Deputy Designated Safeguarding Lead:
David Kenny, Head of Service Delivery
David.Kenny@zeelo.co

It is the Designated Safeguarding Lead's responsibility to maintain and update this policy.

Understanding and recognising abuse

The categories of abuse for children and vulnerable adults are different. In the interests of simplification each of the categories are not set out in this policy (see Appendix Two for further detail).

We define abuse in its widest possible terms i.e. as treatment that causes harm to a child or vulnerable adult. The protection of children and vulnerable adults is our shared responsibility and if you have any concerns a child or vulnerable adult is being maltreated, or you have safeguarding concerns about the behaviour of another member of staff, driver or someone working with or for Zeelo, do something about it, by following the flow charts set out below.

Remember

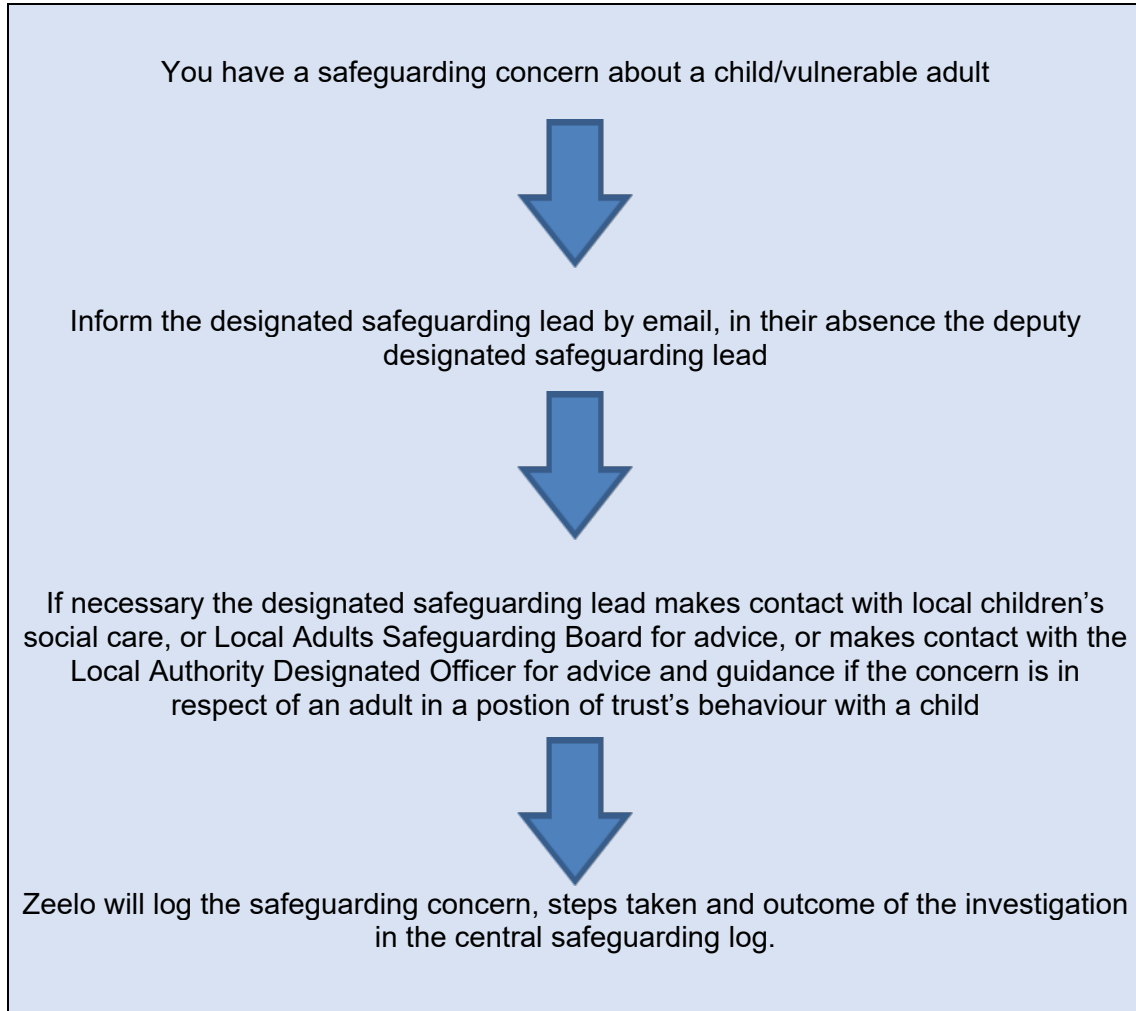
It is better to err on the side of caution and get it wrong than do nothing and then something happens to that child/vulnerable adult.

Reporting what you see may be the missing piece of a puzzle to safeguard both children/vulnerable adults.

The reporting process

If you have a safeguarding concern about a child or vulnerable adult or wish to express a concern about a member of Zeelo staff, a contracted driver, or equivalent, possibly abusing a child or adult – **follow the flowchart**

What to do if you have a safeguarding concern



Safeguarding Log

Incidents flagged as Safeguarding concerns and breaches of safeguarding policy are retained centrally by Zeelo in our dedicated work management tool. Details of the persons effected are anonymised however drivers or contractors information may remain where it is deemed necessary to safeguarding and prevent future concerns.

Zeelo's safeguarding log is review by the Fast Pod routinely and shared with our Board of Directors on a quarterly basis.

Escalating Concerns

It is important to note that if you raise a safeguarding concern or pass on an allegation, you have a responsibility to ensure your concern is addressed to your satisfaction.

Therefore, if you feel that your concern has not been addressed to your satisfaction you should escalate the matter to the Managing Director of Zeelo.

Escalation contact:

John Slingsby – john@zeelo.co

Legal issues

Information Sharing & Confidentiality

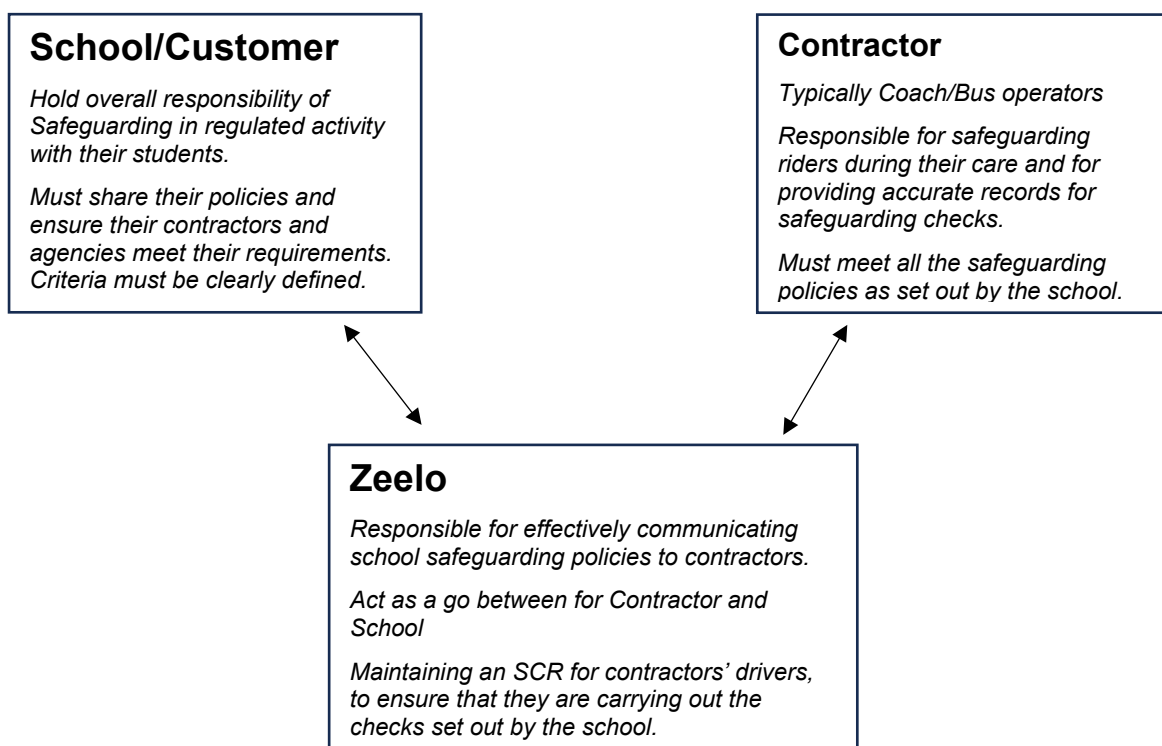
Information should always be shared if you think a child or vulnerable adult is suffering, or likely to suffer, abuse.

The protection of children and vulnerable adults takes precedence over other legal rights. Please be assured that as long as information is shared in an appropriate manner and in good faith, the law will protect you. You should ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and shared promptly.

For further guidance see the statutory guidance on information sharing <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Our Roles in Safeguarding

Below we outline the responsibility of each party, including school, Zeelo and our contractors.



What role does Zeelo take?

The role that Zeelo take in safeguarding our riders and staff members varies depending on whether we employ the staff member direct. In most cases, bus drivers are employed by our partners directly and we assume a role in verification, to ensure that our partners fulfil the expectations set out in statutory guidance, including but not limited to Keeping Children Safe in Education 2023, the Rehabilitation of Offenders' Act 1974 and General Data Protection Regulation, 2018. Where Zeelo hire a staff member directly, we perform all statutory compliance checks directly.

Zeelo's responsibility is to ensure our contractors/partners perform their statutory checks. The partner/contractor holds ultimate responsibility for these checks.

Zeelo reserves the right to perform spot checks on information provided to ensure that all compliance information is true and accurate.

Contractors must supply accurate information to Zeelo during the verification process. Failure to do so could result in the immediate termination of their contracts.

What checks are required, depends on whether the staff member, driver, or equivalent is working in 'Regulated Activity'.

Regulated Activity includes teaching, training, instructing, caring for or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children; for 3 days or more over any 30-day period.

School bus drivers therefore fall within Regulated Activity. Only those working in regulated activity can request an Enhanced DBS (<https://www.gov.uk/government/organisations/disclosure-and-barring-service/about>)

Drivers in Zeelo Commute and Charter do not work in Regulated Activity and therefore are not subject to the same checks as set out by law.

For those contractors working in regulated activity, these are the statutory checks our contractors/partners must complete:

- Identity Checks
- 2 Satisfactory references have been obtained
- Enhanced DBS (guidance states it shouldn't older than 3 years old)
- Child barred list check
- Overseas checks – if they have lived outside the UK for a 3 month period over the last 10 years
- Verify professional qualifications, as appropriate.

- Right to work in the UK
- Safeguarding training taken place

For staff employed direct by Zeelo, Zeelo are responsible for performing the same checks where they are working in regulated activity.

What checks are performed (External Staff member – i.e. Bus drivers)

Information Requested	Reason for requesting information	Zeelo's role
Driver Name	Identification of individual	Confirm check complete
Contractor Role (i.e., Driver or Chaperone)	Identify what further data we need to collect	Confirm check complete
Certifier Name	Contractors cannot self-certify their information	Confirm check complete
Company Name	Identify which company driver works for	Confirm check complete
Certifier Position		
Driver email address	This is used to set up access to Zeelo and Kura Apps	Owner
Drivers Mobile	This is used for contacting in live environment and text reminders on services	Owner
Confirmation the company have the drivers Full Employment History	To comply with Keeping Children safe in Education. Employees must inform their employer of the reasons for any gaps. Zeelo do not see evidence of this information.	Confirm check complete
How long has the contractor known the driver?		Confirm check complete
How long has the driver worked for their business?		Confirm check complete
Do you have the medical verification for the driver?	Zeelo do not need to see this verification, only that the operator confirms that they have confirmed the driver is fit to carry out their duties in a safe manner.	Confirm check complete
Has the company completed Address and Identity checks	Zeelo request confirmation of what form of identification was used to carry out these checks. Zeelo do not see evidence of this information, unless specifically requested on a contract.	Confirm check complete

Assurance that right to work checks have been complete.	Ensuring the drivers and contractors used are legally permitted to do so.	Confirm check complete
Date drivers' licence and CPC was checked?	This is asked to ensure it matches the contractor/partners policy they issue in their audit to work with Zeelo.	Confirm check complete
Drivers Licence Cat D expiry and CPC expiry	To ensure professional qualifications always remain in date on Zeelo contracts.	Confirm check complete and remains in date
Confirmation they have an Enhanced DBS with Child Barred List check	Zeelo cannot complete this for staff employed by others, however we get assurance from contractors to ensure the right type of DBS has been applied for.	Confirm check complete
EDBS Disclosure number, Issue date	We check the EDBS number looks correct and in line with the issue date given. Issue date is used to ensure we comply with guidance by keeping Enhanced DBS within 3 years.	Confirm check complete and remains in date
Confirmation if they are on the update service and if we have permission to check it.	Where a driver is on the update service, we do perform a check to ensure it is still live and valid. This is part of checking the EDBS remains within 3 years at all time.	Update service checked by Zeelo
Does the Enhanced DBS have any entries	We request this, as contracts vary. Some contracts will allow drivers with entries on their EDBS to be permitted, whilst to comply with our contract, others do not permit any form of entry.	Validate and spot check accuracy.
Where a contractor confirms an entry is on the DBS, we request a copy of their EDBS	We request a copy of the EDBS and collate a risk assessment to be passed to Zeelo customers for sign off. This is passed over anonymized for the customer to risk assess the entry prior to granting permission to be used. Risk Assessment template can be found in Appendix 3	Zeelo produce a risk assessment for the schools sign off – we make no recommendation.
Confirmation of two satisfactory references	Zeelo seek assurances that our contractors have complete these. We do not see copies of the references.	Confirm check complete

Has the driver spent more than 3 months continuous overseas in the past 10 years	This is asked to ensure those drivers who have spent over 3 months have an overseas check complete as the Enhanced DBS is not enough on its own	Confirm check complete
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NB: Enhanced DBS are only used in England and Wales. For drivers based in Scotland, Disclosure Scotland checks are complete.

Customer specific requirements

Zeelo understand that each customer may have slightly different requirements or take a different view on aspects of safeguarding and risk management.

During the onboarding process, it is the customers responsibility to inform Zeelo of any such requirements. Where reasonable requests are made, Zeelo will endeavour to implement those requirements.

Zeelo store this information in our dedicated work management tool and provide training to effected members of Zeelo staff on the delivery of these requirements.

Where a customer wishes to make changes to a current policy or way of working, Zeelo will endeavour to make changes as quick as possible, but in some cases may need as much as 3 months' notice to make such a change.

Approving a driver/chaperone for use

Zeelo operate a two-tier authorisation for drivers/chaperones to be used in regulated activity. Once the data is collected and verified, it is given a second review by the DSL or deputy DSL.

Training on the Zeelo and Kura App is provided, alongside our code of conduct.

Drivers are then set up with their unique log in details for the systems so only they can drive on regulated services.

Data Retention Policy

All of the verification data is retained for the duration of their contract with Zeelo and for an additional 6 months. This data is retained within our Single Central Record.

Full data is restricted to the Zeelo Safeguarding Team and Fast Pod. Other staff delivering services have access to driver name, contact details and schools they are permitted to driver for.



For drivers/chaperones who have been prohibited for use for whatever reason, we hold basic details indefinitely for the purpose to safeguard any future work that Zeelo may carry out. Data is restricted to name, reason for prohibiting them and the company they worked for when prohibited.

Appendix One

Definitions

“Safeguarding” and “Child Protection”

In terms of adults The Care Act 2014 defines adult safeguarding as “protecting a person’s right to live safely, free from abuse and neglect”. There are more categories of abuse with adults than there are with children. With adults the categories are physical abuse, emotional/psychological abuse, financial abuse, sexual abuse, organisational abuse, neglect, discriminatory abuse, domestic violence, modern slavery and self-neglect.

In terms of children, the definition of safeguarding is broader and is set out in “*Working Together to Safeguard Children 2018 - A guide to inter-agency working to safeguard and promote the welfare of children*”. This is the statutory guidance that sets out the legislative requirements and expectations of individual services to safeguard and promote the welfare of children.

Working Together to Safeguard Children 2018 does not separate safeguarding and promoting the welfare of children. This is the definition:

- Protecting children from maltreatment;
- Preventing impairment of children’s health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes

Separate to safeguarding children is “child protection”. Child protection is defined in the Children Act 1989 as where there is “reasonable cause to suspect a child is suffering, or is likely to suffer, significant harm”. The Children Act 1989 introduced significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Physical abuse, sexual abuse, emotional abuse and neglect are all categories of significant harm. Harm is defined as the ill treatment or impairment of health and development.

In simple terms, safeguarding is the overall well-being of the child and every professional and every organisation is responsible for the safeguarding of children. Within that there is child protection, when it is thought a child is either being maltreated or is at risk of maltreatment.

Age of a Child

A child becomes an adult in law at 18 in the UK, this is inline with the United Nations Convention on the Rights of the Child. Many people use the term “young people” but there is no legal definition for the age of a “young person”. 16 and 17 year olds are children, in legal terms.

Vulnerable Adult

An adult at risk is defined by the Care Act 2014 as a person 18 and over who;

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or at risk of, abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

There is a significant difference between the terms “adult”, “adult at risk” and “vulnerable adult”. Adults are allowed to make unwise choices and adults can choose if they want to keep any information about them confidential. Adults, including adults at risk and vulnerable adults can choose not to press charges against an individual who may have assaulted them. These choices can only be overridden by agencies such as the police and social care if it is believed the adult did not have the mental capacity to make the decision in the first place.

Local Authority Designated Officer (LADO)

The role of the LADO is set out in Working Together to Safeguard Children 2018 and is governed by the local authorities duties under section 11 of the Children Act 2004.

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

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

There may be up to three strands in the consideration of an allegation:

- a police investigation of a possible criminal offence;
- enquiries and assessment by children’s social care about whether a child is in need of protection or in need of services;
- consideration by an employer of disciplinary action in respect of the individual.

Regulated Activity

The new definition of regulated activity in relation to children comprises, in summary:

- i. unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/ guidance on well-being, or drive a vehicle only for children;
- ii. work for a limited range of establishments (‘specified places’), with opportunity for contact: e.g. schools, children’s homes, childcare premises. Not work by supervised volunteers;

Work under (i) or (ii) is regulated activity only if done regularly¹

The definition of Regulated Activity for adults defines the activities provided to any adult as those which, if any adult requires them, will mean that the adult will be considered vulnerable at that particular time. These activities are: the provision of healthcare, personal care, and/or social work; assistance with general household matters and/or in the conduct of the adult’s

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

own affairs; and/or an adult who is conveyed to, from, or between places, where they receive healthcare, relevant personal care or social work because of their age, illness or disability.

The position of trustee of a vulnerable groups' or children's charity is not a regulated activity in itself. It is only if trustees have close contact with these vulnerable beneficiaries that they would fall within the scope of regulated activity and be eligible to obtain an enhanced DBS check and barred list check. A trustee of a charity who no longer falls within the definition of regulated activity would be eligible to obtain an enhanced DBS check (but without a barred list check)².

² <https://www.gov.uk/government/publications/safeguarding-children-and-young-people/safeguarding-children-and-young-people#endnote>

Appendix Two

Categories of Abuse

Child Abuse

The categories of abuse of children are set out in the statutory guidance *Working Together to Safeguard Children 2018* and are as follows:

Physical Abuse

A form of abuse which 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

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber 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

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual

activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, 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 may involve a parent or carer failing to:

1. provide adequate food, clothing and shelter(including exclusion from home or abandonment)
2. protect a child from physical and emotional harm or danger
3. ensure adequate supervision (including the use of inadequate care- givers)
4. ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Although not specifically a category of abuse extremism is something we are very aware of at X. As set out in *Working Together to Safeguard Children 2018* "Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist".

Adult Abuse

There are ten categories of abuse for adults:

- Physical abuse
- Domestic violence or abuse
- Sexual abuse
- Psychological or emotional abuse
- Financial or material abuse
- Modern slavery
- Discriminatory abuse
- Organisational or institutional abuse
- Neglect or acts of omission
- Self-neglect

For details of types of each kind of abuse and possible indicators, see the following link: <https://www.scie.org.uk/safeguarding/adults/introduction/types-and-indicators-of-abuse>

Appendix Three

Zeelo Risk Assessment

Assessment Criteria – Regulated Activity

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered or obtained through a Disclosure Barring Service check, we will consider the following assessment criteria before agreeing for a driver to work on a school service.

- Whether the conviction or other matter revealed is relevant to the position in question;
- The seriousness of any offence or other matter occurred;
- The length of time since the offence or other matter occurred;
- Whether the person has a pattern of offending behaviour or other relevant matters;
- Whether the person's circumstances have changed since the offending behaviour or other relevant matters;

It is our policy to consider the following offences high risk, and any of the below must be declared and the person concerned may not be used for any school service, without the explicit permission of the company.

- Murder
- Manslaughter
- Rape or other serious sexual offences
- Grievous bodily harm or other serious acts of violence
- Serious Class A drug related offences
- Robbery
- Burglary
- Theft
- Deception or Fraud

Should the check raise any other offending behaviour or other relevant matters that could be reasonably regarded as causing concern in relation to the provision of services relating to children this should be disclosed to the company in accordance with the above.

Disclaimer: Zeelo cannot make a recommendation on whether someone is suitable to work in regulated activity under this risk assessment and is the responsibility of the customer.

Information provided in this risk assessment is provided by the contractor and Zeelo have no means of verifying its accuracy, other than where Zeelo have seen a physical copy of a certificate and the conviction details.