

# SAFEGUARDING POLICY

AUGUST 2026

## INTRODUCTION

Girls Are Investors, hereby known as GAIN, (the charity) is a registered charity run for the following purpose:

To improve gender diversity in investment management by building a talent pipeline of entry-level women and non-binary candidates. Our focus is to generate more and better prepared women and non-binary candidates for investment firms through early engagement with school, college and university students. We inform young women and non-binary students with free resources, events and programmes. We inspire young women and non-binary people with a network of female industry role models who speak at events and offer mentorship.

Charity number: 1182317

## THE PURPOSE AND SCOPE OF THIS POLICY STATEMENT

The purpose of this policy statement is:

- to protect children and young people who receive GAIN's services from harm. This includes the children of adults who use our services. Under this policy, the term children shall mean any person who is under eighteen years of age
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of GAIN, including senior managers and the board of trustees, paid staff, volunteers, sessional workers, agency staff, interns, and students.

## LEGAL FRAMEWORK

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England, Northern Ireland, Scotland and Wales. A summary of the key legislation and guidance is available from [www.nspcc.org.uk/childprotection](http://www.nspcc.org.uk/childprotection)

## SUPPORTING DOCUMENTS

This policy statement should be read alongside our organisational policies, procedures, guidance, and other related documents:

- [role description for the safeguarding lead](#)
- [behaviour code for adults working with children and young people](#)
- [photography and filming policy – children and young people](#)
- [online safety](#)
- [anti-bullying](#)
- [managing complaints](#)
- [whistleblowing](#)

- [health and safety](#)
- [privacy policy](#)
- SIC delivery and safeguarding procedures

## THE RISKS TO CHILDREN AND YOUNG PEOPLE:

Children can be vulnerable to different forms of abuse and harm. It is important to recognise that abuse and harm of children can cover a wide range of circumstances and behaviours. For example, children can be at risk of:

- physical or emotional abuse
- neglect
- sexual abuse
- female genital mutilation (FGM)
- grooming and exploitation
- trafficking and modern slavery
- exposure to or infliction of domestic abuse
- bullying or cyber bullying
- exposure to other inappropriate content or behaviour, such as violence or criminal behaviour
- self-harm
- physical harm when engaging with activities without adequate supervision

The causal factors of any such harm and/or abuse can also be wide-ranging. For example, children can be placed at risk by family members or members of the community.

## WE BELIEVE THAT:

Children and young people should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

To do this we recognise that:

- the welfare of children and young people is paramount in all the work we do and in all the decisions we take
- working in partnership with children, young people, their parents, carers, and other agencies is essential in promoting young people's welfare
- all children and young people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- extra safeguards may be needed to keep children and young people who are additionally vulnerable safe from abuse.

## WE WILL SEEK TO KEEP CHILDREN AND YOUNG PEOPLE SAFE BY:

- valuing, listening to, and respecting them
- appointing a nominated safeguarding lead for children and young people, a deputy, and a lead trustee/board member for safeguarding

- adopting child protection and safeguarding best practice through our policies, procedures, and code of conduct for staff and volunteers
- developing and implementing an effective online safety policy and related procedures
- providing effective management for staff and volunteers so that all staff and volunteers know about and follow our policies, procedures, and behaviour codes confidently and competently
- recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- making sure that children, young people and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families, and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff, and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people, and their families, treat each other with respect and are comfortable about sharing concerns.

## SAFEGUARDING PRINCIPLES

Safeguarding children and young people from harm and abuse is an essential responsibility for GAIN. We are committed to ensuring that any child or young person who comes into contact with our services is properly safeguarded.

Every person under this policy must ensure that they play an active role in ensuring that children and young people are properly safeguarded. Every person under this policy holds responsibility for:

- remaining alert and aware of possible safeguarding risks to children and young people
- guarding children against harmful environments with appropriate actions (for example, adequate supervision or ensuring safe environments)
- taking positive steps to maintain the safety and wellbeing of children engaging with us as a charity
- reporting concerns expeditiously and appropriately, in line with child protection procedures
- understanding the duty to report specific concerns (and understanding how this interplays with confidentiality)
- challenging any inappropriate or harmful behaviour of any other adult and reporting this accordingly
- acting appropriately in the presence of children and young people
- not taking any inappropriate risks
- not smoking, drinking or taking any form of illicit substances in the presence of children

## RESPONDING TO A SAFEGUARDING CONCERN

Where a child or young person is at immediate risk of serious harm, call 999. Thereafter, an available allocated safeguarding lead should be contacted as soon as is reasonably practicable.

Where there is a safeguarding concern but no immediate risk of serious harm, the person who has heard or witnessed this concern should consult with an available safeguarding lead as soon as practicable and by no later than the end of the same day.

Where any child or young person makes a disclosure relating to harm or abuse, it is important for that person to:

- listen calmly and carefully, showing that their views are taken seriously
- provide an appropriate and honest level of reassurance
- avoid interrogating the child or young person by asking probing, intrusive and/or leading questions
- avoid making false promises regarding confidentiality and keeping the disclosure secret (because any concern of abuse or harm must be shared with the safeguarding lead and potentially other authorities)
- make a confidential written record of the discussion either during the discussion or immediately afterwards. The record should include key details of the disclosure together with any relevant times, dates, places and people concerned. Audio and video recordings of children or young people making disclosures should be avoided
- Refer all relevant information to an available safeguarding lead as soon as practicable afterwards, and by no later than the end of the day

Upon receipt of any safeguarding concern, all safeguarding leads shall consult with any other relevant persons and will make any appropriate referrals to the relevant authorities, such as the application Local Authority Children's Services department or the police.

## REPORTING CONCERNS ABOUT OTHER ADULTS

Where any person has a concern regarding the conduct of an adult connected to GAIN, which poses or may pose a safeguarding risk to children or young people such as:

- harming a child or young person either physically or emotionally
- exposing a child or young person to behaviour which may cause physical or emotional harm
- engaging in criminal activity concerning a child or young person

this must be raised in the first instance with an available safeguarding lead (or where this is not appropriate, a different senior member of the organisation) so that the next appropriate steps may be agreed and actioned.

Usually, any appropriate steps following a safeguarding referral in respect of an individual connected to GAIN will include either:

- further initial enquiries
- escalation to the applicable Local Authority Children's Services department for assessment and/or the police for investigation
- instigation of any appropriate disciplinary, formal investigation processes and suspension of any person concerned within the charity
- a referral to the Disclosure and Barring Service, Disclosure Scotland or Access Northern Ireland, or any other relevant regulatory bodies

Any person within GAIN who has allegations made against them shall be informed properly in a formal meeting of the particulars of the allegations and the relevant next steps which shall be taken. Such a meeting should ordinarily be held by a safeguarding lead. On certain occasions, such a meeting may not be convened until that has been approved by any authorities involved (such as the police or the relevant Local Authority).

Any person from within GAIN who has allegations made against them shall be treated fairly. All enquires, investigations and decisions taken shall be just and fair, with the safety of any child or young person concerned at the heart of the process.

Any person from within GAIN who makes an allegation against another person from within the charity shall be listened to taken seriously and shall be treated fairly and justly throughout the process of enquires, investigations and decision making.

## INTERNATIONAL PARTICIPANTS

Some of GAIN's programmes and content, are accessible to students based outside of the UK. The legal framework and escalation routes set out above (see 'Legal framework' and 'Responding to a safeguarding concern') are built around law and reporting mechanisms in England, Northern Ireland, Scotland and Wales, and do not automatically extend to a concern arising about a student based overseas.

For international participants, GAIN will:

- Continue to apply GAIN's own definition of a child (anyone under 18) regardless of the age of majority or age of digital consent in the student's own country.
- Where GAIN is working with an international partner school, rely on that school's own safeguarding procedures and designated safeguarding lead as the first point of local escalation, in line with GAIN's wider approach to international partnerships.
- Where there is no partner-school safeguarding contact, escalate any concern to GAIN's own safeguarding lead in the first instance, who will take advice on next steps, which may include contacting GAIN's legal advisers, or, for a concern about immediate risk of serious harm, advising the reporter to contact local emergency services directly.
- Recognise that GAIN cannot make a report to a UK statutory body (such as Local Authority Children's Services, the police, or the DBS) about a concern involving a person who is not in the UK, and will not advise that it can.
- Take legal advice on data protection obligations relevant to international participants, since data protection rules for children, including thresholds for parental consent, vary by country.

This section reflects GAIN's current approach and will be reviewed, with legal input, as international programme delivery expands.

## CONTACT DETAILS

### NOMINATED SAFEGUARDING LEAD

Name: Tasha Hoskins

Email: Tasha@gainuk.org

### DEPUTY SAFEGUARDING LEAD

Name: Tanya Tracey

Email: Sherin@gainuk.org

### TRUSTEE/SENIOR LEAD FOR SAFEGUARDING AND CHILD PROTECTION

Name: Lawrence Foley

Email: lawrence.foley@gmail.com

### NSPCC HELPLINE

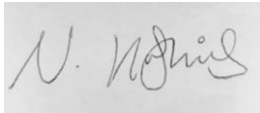
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## REVIEW DATE

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on 21<sup>st</sup> August 2026

Signed:



Date: 21 / 08 / 2026