REAL Inspiration
Social Enterprise

Real Inspiration CIC

Safeguarding Policy

Safeguarding Procedures

Prevent Policy

Data Protection Policy

Photography Policy

Health and Safety Policy

Real Inspiration Safeguarding Policy

This policy applies to all paid staff, volunteers, sessional workers, freelance practitioners, contractors, students on placement, and anyone working on behalf of Real Inspiration, which provides creative alternative education and support to children and young people.

The purpose of this policy is:

- To protect children and young people who receive our services and to safeguard and promote their welfare.
- To provide staff, volunteers and practitioners with clear principles and procedures for identifying, reporting, recording and responding to safeguarding concerns.
- To ensure that safeguarding is embedded across Real Inspiration's education, therapeutic, creative, online, off-site, home-visit and one-to-one work.

Real Inspiration believes that a child or young person should never experience abuse, neglect or exploitation of any kind. We have a responsibility to promote the welfare of children and young people and to keep them safe. We are committed to working in a child-centred, trauma-informed and professionally accountable way.

Legal and Statutory Framework

This policy has been developed with regard to relevant legislation and current statutory safeguarding guidance, including:

- Children Act 1989
- Children Act 2004
- Children and Families Act 2014
- Education Act 2002, where applicable
- Education and Skills Act 2008, where applicable
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- Sexual Offences Act 2003
- Protection of Freedoms Act 2012
- Keeping Children Safe in Education 2026, used by Real Inspiration as a safeguarding benchmark where applicable to our status
- Working Together to Safeguard Children 2026
- Information Sharing to Safeguard Children and Young People statutory guidance 2026
- Current local safeguarding partnership procedures and guidance

Real Inspiration will review this policy whenever relevant legislation, statutory guidance or local safeguarding procedures change.

Safeguarding Principles

We recognise that:

- The welfare and best interests of the child are central to safeguarding decision-making.
- Safeguarding is everyone’s responsibility and concerns must be acted upon without delay.
- Children and young people should be listened to, taken seriously and involved in decisions affecting them wherever appropriate.

- All children have a right to protection from abuse, neglect and exploitation regardless of age, disability, sex, gender identity, race, religion or belief, sexual orientation, communication needs or background.
- Children with SEND, communication differences, trauma histories, mental health needs or other vulnerabilities may face additional barriers to recognising, disclosing or reporting harm.
- Safeguarding concerns can arise in person, online, in the home, in the community, during transport, on visits or within peer and professional relationships.
- Effective safeguarding depends on appropriate information sharing and partnership working with children, families, commissioners and relevant agencies.

How We Keep Children and Young People Safe

Real Inspiration will seek to keep children and young people safe by:

- Valuing, listening to and respecting children and young people.
- Maintaining clear safeguarding procedures and professional boundaries for staff, volunteers, freelancers and contractors.
- Providing appropriate safeguarding training, induction, supervision and updates.
- Recruiting and engaging staff and practitioners safely and completing appropriate vetting and checks.
- Maintaining a Designated Safeguarding Lead (DSL) and clear arrangements for reporting concerns.
- Using risk assessments and individual support or safety plans where appropriate.
- Maintaining appropriate online-safety, photography, data-protection and information-sharing arrangements.
- Responding appropriately to allegations, low-level concerns and concerns about adults working with children.
- Working with parents/carers, local authorities, schools, social care, health services, police and other professionals where appropriate.
- Keeping accurate, secure and timely safeguarding records.
- Ensuring safeguarding remains central to one-to-one work, lone working, transport, home visits and off-site activities.

Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is Natasha Rehman. Safeguarding concerns should be reported to the DSL as soon as possible. If the DSL is unavailable, this must not delay action or a referral where a child may be at risk of harm.

Where a concern relates to the DSL, staff must follow Real Inspiration's Allegations Against Staff and Whistleblowing procedures and seek advice from the relevant local authority safeguarding service/LADO as appropriate.

Safeguarding Procedures

Any concern regarding the welfare or safety of a child or young person must be recorded promptly and reported to the DSL. Concerns may arise through:

- Something a child, parent, professional or other person tells you.
- Something you observe, including injuries, changes in presentation, behaviour, attendance or emotional state.
- Information received from another agency or professional.
- Online activity or communication.
- Your professional knowledge of the child or family.
- A professional concern or sense that something may be wrong, even where the full picture is not yet clear.

If a Child Discloses Abuse or Harm

If a child or young person discloses abuse, neglect, exploitation or another safeguarding concern, staff should:

- Remain calm, listen carefully and take the child seriously.
- Allow the child to speak in their own words and avoid asking leading or unnecessary questions.
- Do not investigate or attempt to establish proof.
- Do not promise confidentiality. Explain that information may need to be shared with people who can help keep them safe.
- Reassure the child that they have done the right thing by speaking.
- Record the disclosure promptly, accurately and factually, using the child's own words where possible.
- Report the concern to the DSL without delay.

- Seek medical assistance or contact emergency services where there is an immediate risk to life or safety.

Staff must not photograph injuries or ask a child to remove clothing in order to examine an injury.

Information Sharing and Confidentiality

Real Inspiration recognises that effective and timely information sharing is essential to safeguarding children and young people. No single practitioner can hold a complete picture of a child's circumstances, and relevant information may need to be shared between professionals and agencies to identify needs, assess risk and protect children from harm.

Staff must never promise a child, young person or family absolute confidentiality where safeguarding concerns exist.

Where there are safeguarding concerns, information may be shared without consent where there is a lawful basis for doing so. Data protection legislation does not prevent the sharing of personal information for safeguarding purposes when sharing is necessary, proportionate and lawful.

Staff should not allow uncertainty about data protection or consent to prevent necessary safeguarding action. Where there is uncertainty, advice should be sought from the DSL unless doing so would cause an unsafe delay.

Real Inspiration will share information proactively and as early as appropriate where this may help to identify, assess or respond to risks or concerns regarding the safety and welfare of a child.

When deciding whether and how to share information, staff and the DSL will consider:

- The safety and welfare of the child as the primary consideration.
- Whether there is a clear safeguarding purpose for sharing the information.
- The appropriate lawful basis for processing and sharing the information.
- Whether seeking consent is appropriate and safe.
- Whether the information is relevant, accurate and up to date.
- Whether only the information necessary for the safeguarding purpose is being shared.
- Who needs to receive the information and how it can be shared securely.
- Whether sharing information could increase risk to the child or another person.

Wherever appropriate and safe, children, young people and their parents or carers will be informed about how their information may be used and shared. Consent is not always required for safeguarding information to be shared, particularly where seeking consent could place a child or another person at greater risk, prejudice the prevention or detection of crime, or otherwise undermine safeguarding action.

The DSL will ensure that safeguarding information is shared with relevant agencies and professionals when required. This may include Children's Social Care, the police, health professionals, the Local Authority, safeguarding partners, commissioning schools or authorities and other professionals involved in supporting the child.

Decisions about information sharing must be recorded. Records should include what information was shared, with whom, the purpose of sharing, the basis for the decision where relevant, whether consent was sought or obtained, and the reasons for the decision to share or not to share.

Information must be shared securely and only with those who need it for the safeguarding purpose. Where a child transfers to another education provider, relevant safeguarding information will be transferred securely and promptly in accordance with current guidance and local procedures.

Reporting and Referring Concerns

If a child is in immediate danger or there is an immediate risk to life, call 999.

Where there is a safeguarding concern but no immediate emergency, staff must report the concern to the DSL without delay- Natasha Rehman 07736317679. The DSL will consider the appropriate next action, which may include consultation with or referral to Children's Social Care, the police, health services, the commissioning body or other relevant agencies.

A staff member does not need to wait for the DSL if doing so would place a child at increased risk or cause an unsafe delay. Any practitioner may make a safeguarding referral where necessary.

If a referral is made, Real Inspiration will record the referral, actions taken, decisions and rationale, advice received and outcomes, and will follow up where an expected response is not received.

Safeguarding Records

Safeguarding records will be factual, timely, accurate, confidential and stored securely. Records should clearly show:

- The concern or disclosure.
- The date, time and people involved.

- Actions taken.
- Decisions made and the rationale for those decisions.
- Information shared and with whom.
- Advice or referrals sought.
- Outcomes and any follow-up required.

Safeguarding records will be kept separately from general educational records where appropriate and access will be restricted to those who need the information for safeguarding purposes.

Concerns About Staff, Volunteers, Freelancers or Contractors

Any safeguarding concern or allegation about an adult working with children must be reported and managed in accordance with Real Inspiration's Allegations Against Staff Policy, Low-Level Concerns arrangements and Whistleblowing Policy. Staff must not investigate allegations themselves. Where the relevant threshold is met, advice will be sought from the Local Authority Designated Officer (LADO) without delay.

Child-on-Child Abuse

Real Inspiration recognises that children and young people can abuse other children and that child-on-child abuse can occur inside or outside the provision and online. It can involve two children or young people or a group, and may affect children of any age, sex, gender or background. All concerns will be taken seriously and responded to as safeguarding concerns.

Child-on-child abuse may include, but is not limited to:

bullying, including cyberbullying, prejudice-based and discriminatory bullying

physical abuse, assault, fighting, hitting, kicking, biting or otherwise causing physical harm, including threats of harm or harm involving a weapon

sexual violence, sexual assault or other sexual offences

sexual harassment, including sexual comments, sexual jokes, unwanted sexualised behaviour or online sexual harassment, harmful sexual behaviour, including behaviour that is developmentally inappropriate, coercive, abusive or violent

consensual or non-consensual sharing of nude or semi-nude images or videos, including pressure or coercion to create or share such material

upskirting or other intrusive image-taking

abuse within children or young people’s intimate personal relationships, including coercive or controlling behaviour

initiation or hazing-type violence or rituals

online abuse, threats, harassment, exploitation or coercion

Our Approach to Child-on-Child Abuse

Real Inspiration has a zero-tolerance approach to child-on-child sexual harassment and sexual violence. Abuse or harmful behaviour will never be dismissed as “banter”, “part of growing up” or similar. Staff should recognise that the absence of reports does not mean that abuse is not occurring and should remain alert to changes in behaviour, attendance, emotional wellbeing, relationships or online activity that may indicate a concern.

Staff must also recognise that children with SEND, communication differences, social or emotional needs, previous trauma or other vulnerabilities may face additional risks and additional barriers to recognising, reporting or explaining abuse. Behaviour should not automatically be attributed to a child’s disability or additional needs.

Responding to a Report or Concern

Any report, disclosure, observation or concern about possible child-on-child abuse must be reported to the DSL without delay and recorded in accordance with Real Inspiration’s safeguarding procedures. Staff must not investigate the matter themselves or attempt to mediate between the children before safeguarding risks have been considered.

When responding, Real Inspiration will:

listen to the child or young person, take the concern seriously and avoid leading or unnecessary questions

consider the immediate safety and welfare of all children involved

consider the wishes and feelings of the child who has experienced or reported the behaviour, while recognising that these cannot override the need to safeguard

consider the age and developmental stage of the children involved, the nature and frequency of the behaviour, any imbalance of power, coercion, vulnerability, SEND or trauma, and whether the behaviour may constitute a criminal offence

consider whether the children should be separated or whether changes to sessions, supervision, transport, online contact or other arrangements are required

complete or update an individual safeguarding or risk assessment where appropriate

consider whether parents or carers should be informed, unless doing so could increase risk or compromise safeguarding action

seek advice from or make a referral to Children's Social Care, police, the commissioning body or other relevant agencies where appropriate

record decisions, actions, information shared and the rationale for the response

Supporting the Child Who Has Experienced Harm

The child or young person who has experienced or reported harm will be supported in a way that is proportionate to their needs and circumstances. Real Inspiration will seek to avoid actions that unnecessarily isolate, blame or disadvantage them. Support may include a trusted adult, changes to provision or supervision, emotional or therapeutic support within professional boundaries, liaison with parents/carers and professionals, and a safety or support plan.

Responding to the Child Whose Behaviour Has Caused Harm

A child or young person whose behaviour may have caused harm will also be treated as a child with safeguarding and support needs. Real Inspiration will not minimise the impact of their behaviour, but will consider what may be driving it, whether they have experienced abuse or exploitation themselves, and what intervention, boundaries, risk management or specialist support may be required.

Consequences or changes to provision will be considered alongside safeguarding needs and will be proportionate to the circumstances. The needs and safety of the child who experienced harm and the child whose behaviour caused harm will be considered separately; the same member of staff should not be expected to provide conflicting support where this would be inappropriate.

Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

Reports of sexual violence, sexual harassment or harmful sexual behaviour will be managed as safeguarding matters. The DSL will consider the need for immediate protection, medical or specialist support, referral to Children's Social Care and/or police, and liaison with the learner's commissioning body. Real Inspiration will not wait for the outcome of a police or social-care process before taking reasonable steps needed to keep children safe within the provision.

Where an incident may constitute a criminal offence, staff must preserve relevant information and avoid actions that could compromise an investigation. Staff must not view, copy or forward nude or semi-nude images unless specifically required and authorised as part of an appropriate safeguarding process.

Incidents Outside Real Inspiration or Online

Child-on-child abuse that occurs away from Real Inspiration, during transport, in the community, at home or online may still affect a learner's safety and wellbeing within the provision. Such concerns will therefore be considered under this policy where Real Inspiration becomes aware of them, and appropriate safeguarding action will be taken.

Recording, Review and Information Sharing

Records relating to child-on-child abuse will be kept securely within safeguarding records. Where children continue to attend Real Inspiration, risk and support arrangements will be reviewed as circumstances change. Relevant information will be shared with parents/carers, commissioners and safeguarding agencies where this is necessary, proportionate and lawful, in accordance with Real Inspiration's Safeguarding and Data Protection Policies.

Online Safety

Online safety forms part of Real Inspiration's safeguarding arrangements. Staff must remain alert to online abuse, exploitation, grooming, bullying, harmful content, inappropriate contact and other online risks. Concerns arising through online activity must be recorded and reported through the same safeguarding procedures as concerns arising face to face.

Training and Professional Responsibility

All staff, volunteers, freelance practitioners and contractors working with children will receive safeguarding information, induction and training appropriate to their role. They are expected to understand how to recognise concerns, how to report them, the importance of professional boundaries, and the requirement to act promptly.

Real Inspiration will use Keeping Children Safe in Education 2026 as an important safeguarding benchmark alongside the statutory and local guidance applicable to the provision.

Monitoring and Review

This policy will be reviewed at least annually and sooner where legislation, statutory guidance, local safeguarding procedures, organisational arrangements or learning from an incident indicate that changes are required.

This policy was last reviewed on: 22 September 2026

Review date: September 2027

Signed: Natasha Rehman

Role: Director / Designated Safeguarding Lead

PREVENT Policy

1. Purpose

Real Inspiration is committed to safeguarding children and young people from radicalisation and extremism. This policy outlines how the provision fulfils its responsibilities under the Prevent Duty, as set out in the Counter-Terrorism and Security Act 2015.

The Prevent Duty forms part of the provision's wider safeguarding responsibilities and is implemented in line with Keeping Children Safe in Education (KCSIE) and local safeguarding partnership procedures.

---

2. Scope

This policy applies to:

- children and young people aged 11–25
- all staff, volunteers, and contractors
- all provision activities, including off-site sessions and online engagement

---

3. Definition

Radicalisation refers to the process by which an individual comes to support terrorism or extremist ideologies.

Extremism is defined as the vocal or active opposition to fundamental British values, including:

- democracy
- the rule of law
- individual liberty
- mutual respect and tolerance of different faiths and beliefs

---

4. Risk Assessment

Real Inspiration recognises that the risk of radicalisation is low but not absent. Risk is assessed as part of:

- safeguarding risk assessments
- individual learner risk profiles
- online safety procedures

Risk factors may include:

- social isolation
- mental health needs
- SEND vulnerabilities
- exposure to extremist content online
- grievance or identity struggles

---

5. Role of the DSL- Natasha Rehman 07736317679

The Designated Safeguarding Lead (DSL) is responsible for:

- acting as the single point of contact for Prevent concerns
- ensuring staff receive appropriate Prevent awareness training
- making referrals to local Prevent/Channel services where required
- maintaining secure records of Prevent concerns and actions

---

6. Staff Responsibilities

All staff are required to:

- complete Prevent awareness training
- be alert to signs of radicalisation
- report concerns immediately to the DSL

- follow safeguarding and online safety procedures
- promote safe, respectful discussion

Staff must not investigate concerns themselves.

---

7. Working with Learners

The provision promotes:

- critical thinking
- respectful dialogue
- emotional regulation and resilience
- understanding of diversity and inclusion

Learners are supported to express views safely and appropriately.

---

8. Online Safety

- Access to online content is risk-assessed
- Staff supervise and monitor online use
- Concerns about extremist content are reported through safeguarding procedures

---

9. Referrals and Action

If a Prevent concern is identified:

1. The DSL assesses the concern
2. Advice is sought from the Local Authority Prevent Lead where appropriate- prevent@hertfordshire.gov.uk anti terrorist hotline 0800789321
3. A Channel referral may be made if the threshold is met

Parents/carers and commissioning bodies will be informed unless this would increase risk.

---

10. Record Keeping

All Prevent-related concerns and actions are:

- recorded securely
- stored with safeguarding records
- shared on a need-to-know basis only

---

11. Training

- All staff receive Prevent awareness training
- The DSL receives enhanced safeguarding and Prevent training
- Training is refreshed regularly

---

12. Review

This policy is reviewed annually or sooner if:

- legislation changes
- guidance is updated
- there is a Prevent-related incident

---

13. Linked Policies

This policy should be read alongside:

- Safeguarding Policy

Signed: Natasha Rehman

Name: Natasha Rehman

Role: Director/ DSL

Date: 1.9.26

Our Data Protection Policy

Real Inspiration collects and uses personal information about children and young people, parents and carers, staff, freelance practitioners, volunteers, commissioners, schools, local authorities, suppliers and other professionals. We are committed to handling personal information lawfully, fairly, transparently and securely.

This policy applies to all staff, directors, volunteers, contractors and freelance practitioners who handle personal information on behalf of Real Inspiration.

Legal Framework

Real Inspiration processes personal information in accordance with applicable UK data protection law, including:

· UK General Data Protection Regulation (UK GDPR)

· Data Protection Act 2018

· Data (Use and Access) Act 2025, which amends and builds on the UK GDPR and Data Protection Act 2018

· Privacy and Electronic Communications Regulations where applicable

· Relevant Information Commissioner's Office (ICO) guidance

Data Protection Principles

Personal information will be:

· processed lawfully, fairly and transparently

· collected for specified, explicit and legitimate purposes

· adequate, relevant and limited to what is necessary

· accurate and kept up to date where necessary

· kept for no longer than is necessary

· processed securely using appropriate technical and organisational measures

· managed in a way that allows Real Inspiration to demonstrate compliance with data protection law

Data Controller and Responsibility

Real Inspiration is the data controller for personal information where it determines why and how that information is processed. The Directors are responsible for ensuring that appropriate data protection arrangements are maintained.

All staff and practitioners who handle personal information are responsible for following this policy, protecting confidentiality, using information only for authorised purposes and reporting any suspected loss, disclosure or misuse of personal information immediately.

Personal Information We May Hold

Depending on the individual and the services being provided, information may include:

· names, addresses, telephone numbers, email addresses and dates of birth

· parent/carer and emergency contact information

· attendance, educational records, progress information and qualification evidence

· Education, Health and Care Plans (EHCPs) and SEND information

· health, disability, mental health, therapy or support information where necessary

· safeguarding and child protection information

· risk assessments and individual support plans

· photographs or recordings where there is an appropriate purpose and lawful basis

· staff, volunteer and freelance practitioner records, including recruitment, vetting, training and payment information

· commissioning, invoicing and contractual information

Lawful Bases for Processing

Real Inspiration will identify and document an appropriate lawful basis before processing personal information. Consent is only one possible lawful basis and will not be relied upon where another basis is more appropriate.

Depending on the purpose, Real Inspiration may process personal information because it is necessary for:

· performance of a contract or steps connected with a contract

· compliance with a legal obligation

· protection of someone's vital interests

· performance of a task in the public interest where the relevant requirements are met

· a recognised legitimate interest where the statutory conditions are met, including certain safeguarding purposes

· Real Inspiration's or a third party's legitimate interests, provided those interests are not overridden by the individual's rights and freedoms

· consent, where consent is the appropriate lawful basis and the individual has a genuine choice

Where special category information is processed, such as health, disability or certain safeguarding information, Real Inspiration will also identify an appropriate additional condition under data protection law. Where criminal offence information is processed, an appropriate legal condition will also be identified.

Children and Young People

Children and young people have their own data protection rights. Real Inspiration will take particular care when processing children's information and will use clear, age-appropriate explanations where appropriate.

We will not assume that parental consent is required for every use of a child's personal information. The appropriate lawful basis will depend on the purpose of the processing. Where consent is relied upon, we will consider whether the child is able to provide valid consent and any requirements relating to parental responsibility.

Special Category and Sensitive Information

Real Inspiration works with children and young people who may have complex educational, health, SEND, mental health and safeguarding needs. We will only collect and use sensitive information where it is necessary and lawful, and access will be limited to people who need the information for their role.

Safeguarding and Information Sharing

Data protection law does not prevent necessary and proportionate information sharing for safeguarding purposes. Consent is not usually required where information needs to be shared to safeguard a child or young person.

Safeguarding information may be shared with relevant professionals and agencies where there is an appropriate lawful basis, including Children's Social Care, police,

health professionals, local authorities, commissioning schools or authorities and safeguarding partners.

The decision to share or not share safeguarding information will be recorded where appropriate, including who information was shared with and why. Staff must follow Real Inspiration's Safeguarding Policy and refer safeguarding information-sharing decisions to the Designated Safeguarding Lead where practicable.

Transparency and Privacy Notices

Real Inspiration will provide clear and accessible privacy information explaining how and why personal information is collected and used, the lawful bases relied upon, who information may be shared with, retention arrangements, individual rights, and how to raise a concern or complain to the Information Commissioner's Office.

Privacy information will be reviewed whenever there is a significant change in how personal information is used and otherwise at appropriate intervals.

Data Minimisation, Accuracy and Access

Only information that is relevant and necessary for the identified purpose will be collected or accessed. Staff and practitioners must not access personal information merely because they are technically able to do so. Reasonable steps will be taken to keep information accurate and up to date.

Security and Confidentiality

Real Inspiration will use appropriate technical and organisational measures to protect personal information from unauthorised access, loss, alteration, disclosure or destruction. These include appropriate password protection and access controls, secure storage and sharing, device security, staff confidentiality requirements and secure disposal.

Personal information must not be stored or shared through unauthorised personal accounts, apps or systems.

Data Protection by Design and Risk Assessments

Data protection will be considered when new systems, technologies, projects or ways of working are introduced. Where processing is likely to result in a high risk to individuals' rights and freedoms, Real Inspiration will complete a Data Protection Impact Assessment (DPIA) before the processing begins. When children's information is involved, their particular need for protection will be taken into account.

Retention and Disposal

Personal information will only be kept for as long as there is a lawful and necessary reason to retain it. Real Inspiration will maintain or follow appropriate retention

arrangements for educational, safeguarding, financial, employment and other records. When information is no longer required, it will be securely deleted, destroyed or anonymised as appropriate.

Individual Rights and Subject Access Requests

Individuals have rights over their personal information under data protection law. Depending on the circumstances, these include rights to be informed, access information, correct inaccurate information, request erasure or restriction, object to certain processing, data portability where applicable, and appropriate safeguards in relation to certain automated decision-making.

Children have data protection rights in their own right. A parent or carer does not automatically have a right to exercise all of a child's data protection rights on the child's behalf; the circumstances, the child's competence and relevant legal requirements will be considered.

Subject access requests may be made verbally or in writing. Real Inspiration will verify identity where necessary and respond within the applicable legal timescale, subject to any lawful extension or exemption.

Data Sharing and Processors

Before sharing personal information, Real Inspiration will consider whether the sharing is lawful, necessary, proportionate and secure. Only the information required for the purpose will be shared. Where an external organisation processes personal information on behalf of Real Inspiration, appropriate due diligence and contractual data protection arrangements will be put in place where required.

Personal Data Breaches

A personal data breach includes accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to personal information. All suspected breaches must be reported immediately to the Director or person responsible for data protection.

Real Inspiration will contain and investigate the breach, assess risk, record the breach and actions taken, notify the Information Commissioner's Office within the required timeframe where the legal threshold is met, and inform affected individuals where required by law.

Data Protection Complaints

Anyone who has concerns about how Real Inspiration has handled their personal information may raise the matter with Real Inspiration. Complaints will be considered promptly, fairly and transparently and records of the complaint and outcome will be maintained. Individuals also have the right to raise concerns with the Information Commissioner's Office.

Photography and Images

The processing of photographs and recordings will be governed by this policy together with Real Inspiration's Photography Policy. The lawful basis and purpose will be considered separately for educational evidence, safeguarding, publicity and other uses. Images will not be used for a new purpose simply because they have already been collected.

Training and Review

Staff and practitioners who handle personal information will receive appropriate information and training about their data protection responsibilities.

This policy will be reviewed at least annually and sooner where legislation, ICO guidance, organisational practice or the way Real Inspiration processes personal information changes.

Last reviewed: 22 September 2026

Review date: September 2027

Signed: Natasha Rehman

Role: Director

Photography Policy

Real Inspiration recognises that photographs and recordings can be an important part of evidencing learning, practical participation, creative processes, progress and achievement. We also recognise that images of children and young people are personal data and must be handled carefully, lawfully and in a way that protects safeguarding, privacy and dignity.

This policy applies to all staff, directors, volunteers, contractors and freelance practitioners working on behalf of Real Inspiration.

Educational and Qualification Evidence

Real Inspiration provides practical, creative and therapeutic education in which photographs may form an important part of demonstrating a learner's participation, progress, practical skills and achievement.

Photographs may therefore be taken for legitimate educational, assessment, qualification, moderation, reporting and portfolio purposes where there is an appropriate lawful basis for processing the image.

Where a photograph does not need to identify the learner, staff should wherever reasonably practicable minimise identifiable information, for example by

photographing the work, hands, equipment or creative process rather than the learner's face.

However, where showing the learner undertaking an activity is reasonably necessary to demonstrate participation, skills, progress or achievement, the learner may be identifiable in the photograph.

Evidence photographs must only be used for the educational or assessment purpose for which they were taken and must be stored securely within the appropriate learner record, portfolio or Real Inspiration-approved storage system. Access must be limited to staff, awarding organisations, moderators, commissioners or other authorised persons who reasonably require access.

Publicity, Website and Social Media

Photographs taken for educational or qualification evidence will not automatically be used for publicity, marketing, social media or Real Inspiration's website.

Public-facing use of identifiable photographs will be treated as a separate purpose. Appropriate permission will be obtained before an identifiable learner's image is used for publicity or marketing, and the learner's wishes will be respected according to their age, understanding and circumstances.

Permission for educational evidence does not automatically constitute permission for publicity or social-media use.

Devices Used to Take Photographs

Wherever reasonably practicable, photographs of learners must be taken using a Real Inspiration-owned or approved device.

Where there is a genuine operational need for an authorised member of staff or freelance practitioner to use a personal device for educational evidence, this must be in accordance with Real Inspiration's safeguarding and data-protection procedures.

Before taking photographs on a personal device, automatic cloud synchronisation or backup of images to personal accounts must be disabled wherever the device permits this.

The photograph must be transferred as soon as reasonably practicable to the approved Real Inspiration system or learner portfolio and then permanently deleted from the personal device, including any recently deleted or recycle folder.

Images of learners must never be retained in personal photo libraries, personal cloud storage, personal messaging services or personal social-media accounts.

Staff must not share photographs of learners with other individuals unless this is specifically authorised and necessary for the educational, safeguarding or assessment purpose.

Any loss, accidental upload, inappropriate sharing or other suspected breach involving a learner's photograph must be reported immediately as a potential data-protection and safeguarding incident.

Taking Photographs Safely

When taking photographs of children and young people, staff and practitioners must:

· have a clear and legitimate purpose for taking the photograph

· take only the photographs reasonably necessary for that purpose

· avoid including unnecessary identifying information or other learners where possible

· ensure photographs are appropriate, respectful and consistent with professional boundaries

· avoid photographs in circumstances where a learner may be particularly vulnerable or where the image could reasonably cause embarrassment, distress or loss of dignity

· follow any individual safeguarding, risk-assessment or placement restrictions concerning photography

· ensure photographs are transferred, stored and deleted in accordance with this policy and the Data Protection Policy

Learner Dignity and Choice

Regardless of the lawful basis being used, photographs must be taken respectfully. The purpose should be explained to the learner in an age-appropriate and accessible way wherever practicable.

A learner should not normally be pressured into having their face photographed where equivalent evidence can reasonably be obtained in another way. Particular consideration will be given to safeguarding risks, SEND, trauma, communication needs and any individual risk assessment.

If a learner expresses discomfort about being photographed, staff should consider whether the required evidence can be obtained in another appropriate form and seek advice where necessary.

Consent, Permission and Lawful Basis

Real Inspiration will not assume that consent is the lawful basis for every photograph. The appropriate lawful basis will depend on why the image is being taken and how it will be used.

Enrolment and privacy information will explain the use of photographs for educational, assessment and qualification evidence. Where consent or permission is the appropriate basis for a particular use, it will be specific and capable of being withdrawn where applicable.

Permission for public-facing uses such as marketing, website or social media will be managed separately from routine educational or qualification evidence.

Storage, Retention and Deletion

Images will be stored securely within Real Inspiration-approved systems or authorised learner portfolios and access will be restricted according to role and need.

Images will not be kept for longer than necessary for the purpose for which they were collected, subject to qualification, moderation, safeguarding, contractual or other legitimate retention requirements.

Where an awarding organisation requires evidence to be retained or uploaded, Real Inspiration will follow the relevant awarding organisation's requirements while continuing to apply appropriate data-protection and safeguarding controls.

Sharing with Awarding Organisations, Commissioners and Professionals

Photographic evidence may be shared securely with awarding organisations, moderators, commissioning bodies or relevant professionals where this is necessary and lawful for assessment, quality assurance, reporting, safeguarding or the delivery of the learner's provision.

Only the information reasonably required for the purpose will be shared, using an appropriate secure method.

Visitors and External Photography

Visitors, external photographers and other third parties must not photograph or record learners unless specifically authorised by Real Inspiration and appropriate safeguarding, data-protection and permission arrangements are in place.

External photographers must not have unsupervised access to children or young people through photography activity.

Breaches and Concerns

Any concern about inappropriate photography, recording, storage, access or sharing must be reported promptly to the Director/Designated Safeguarding Lead. Where

appropriate, the incident will also be managed as a personal data breach under Real Inspiration's Data Protection Policy.

Linked Policies

· Safeguarding Policy

· Data Protection Policy

· Online Safety procedures

· Staff Code of Conduct and professional boundaries arrangements

· Lone Working with Students Policy

Review

This policy will be reviewed at least annually and sooner where legislation, safeguarding guidance, data-protection guidance, awarding-body requirements or Real Inspiration's working practices change.

Last reviewed: 22 September 2026

Review date: September 2027

Signed: Natasha Rehman

Role: Director / Designated Safeguarding Lead

Health and Safety Policy

Part 1- Statement of Intent

Our health and safety policy is to, so far as is reasonably practicable:

- Prevent accidents and cases of work related ill-health.
- Manage health and safety risks in our workplace.
- Provide such information, instruction, training and supervision necessary to ensure that our employees are competent to undertake their work.
- Consult with our employees on matters of health and safety.
- Encourage all employees to engage in maintaining safe working practices.
- Provide and maintain safe work equipment.
- Provide all necessary Personal Protective Equipment.
- Ensure that all substances are used, stored and handled safely.
- Maintain safe and healthy working conditions.
- Implement all necessary emergency procedures, including evacuation procedures in the event of fire or other significant incident.

- Ensure that adequate provision is made for welfare facilities and that adequate first aid provisions are made.
- Review this policy annually and revise whenever there is a change in circumstances, in work practices or the introduction of new legislation affecting the policy, so as to ensure that these standards of health and safety are maintained.

Part 2: Responsibilities for health and safety

Overall responsibility for health and safety:

- Natasha Rehman, Managing Director

Day-to-day responsibility for ensuring that this policy is put into practice:

- Natasha Rehman, Managing Director
- Real Inspiration Staff

Additionally, all employees must:

- Co-operate with managers on health and safety matters
- Take reasonable care of their own health and safety
- Report all health and safety concerns to an appropriate person (as detailed above)

Part 3: Arrangements for health and safety

- **Risk Assessment**

  Appropriate risk assessments will be completed, kept under review and their findings implemented.

- **Communication of policy**

  A copy of this policy is available printed in the studio and by email.

- **Training of employees**

  Training shall be provided on induction and on exposure to new or increased risks, for example following the introduction of new equipment, technology or systems of work. Refresher training shall be repeated periodically. Records of all training shall be kept.

- **Consultation with employees**

Consultation with staff on health and safety matters will take place routinely as they arise and following any review of health and safety matters where changes are required.

- **Fire Safety**

  A fire risk assessment has been carried out for the site and will be kept under review. Information about the fire assembly point is displayed in the corridors. Fire Action notices are displayed in the studio.

- **Public safety assessment and procedures**

  A risk assessment has been carried out for visitors to the studio (including freelance workers), and will be kept under review. All freelance workers shall be given safety information, protective clothing or safety equipment as may be necessary.

- **Evacuation & Emergency Procedures**

  In the event of an emergency, the fire alarm will sound and the Tutor will ensure the evacuation of all persons present on site to their assembly point, contact the emergency services when required and ensure compliance with any relevant emergency procedure. Staff shall be informed of the emergency procedures on induction and reminded each year.

- **Accident and investigation Procedures**

Where there is an accident or incident at work, an accident or incident report must be completed. Any accident at work or in connection with work (whether involving an employee, visitor or other person), must be reported immediately to the appropriate person who shall arrange for the accident to be investigated and an accident report prepared, recommending means of preventing re-occurrence where appropriate.

Where the accident or incident is of a type that needs to be reported under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

- **Work equipment selection and maintenance**

  All work equipment provided by the employer for use at work shall be:
  - suitable for the intended use;
  - safe for use, maintained in a safe condition and, in certain circumstances,
  - regularly inspected;

- used only by people who have received adequate information, instruction and training
- accompanied by suitable safety measures, e.g. protective devices, markings,warnings.

All equipment used must be maintained in a safe condition and in good repair. Where necessary, equipment shall be inspected to ensure that it is safe for use without risk of injury or damage and appropriate records shall be kept up to date.

The use of any equipment that is not owned by the employer must be authorised in advance.

- **Personal Protective Equipment**

Personal Protective Equipment (PPE) appropriate for the risks involved and suitable for the task and the person undertaking it will be supplied and must be used whenever there is a risk to staff's health and safety which cannot be adequately controlled by alternative means. Where PPE is required it shall be provided at the employer's cost and must be used by staff in accordance with any manufacturer instructions and any directions and training given. Any defects in PPE must be reported immediately on discovery.

- **Hazardous substances (COSHH), assessment and control measures**

In accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) we will:

- Undertake assessments of all work processes where substances are involved and
  decide which of the processes involve the use of substances hazardous to health
  so that decisions can be made about necessary control measures;
- Maintain records of all COSHH assessments;
- Inform the workforce of any findings of any assessments and provide any person
  exposed to substances hazardous to health with the necessary information,
  instruction and training for them to know the risks to health created by such
  exposure and the precautions that should be taken;
- Review all assessments (if the work process changes significantly) and annually
  from the date of the original assessment; and
- Provide suitable Personal Protective Equipment.

- **Welfare provisions**

Adequate provision will be made for welfare facilities at all sites.

- **First aid provisions**

Adequately stocked first aid boxes will be kept on site and at least Basic First Aid Training will be given

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

This policy was last reviewed on: 1st September 2026

Signed:*Natasha Rehman*