



STATOM HOLDINGS Limited (Statom Group Limited, Statom Group North Ltd, Statom Plant Ltd, Statom Remediation Ltd, Demoforce Group Ltd, FL-Facilities Group Ltd, Slipform Technology Ltd, Spark Tech MEP Ltd, Franki Foundations UK Ltd, Martello Piling Ltd) ("Statom", "the Company")

We are committed to high standards of professional conduct, integrity and accountability. As a leading civil engineering and construction organisation, we recognise that the behaviour and standards of our people are fundamental to building a strong, respectful culture and protecting our reputation as a trusted industry leader.

We expect everyone working for or on behalf of the Company to act with professionalism, respect and responsibility at all times, reflecting our values and supporting a positive working environment. Clear standards of behaviour are essential to ensuring safety, quality and effective collaboration across our projects and teams.

1. Purpose

This policy sets out Statom Group's arrangements for safeguarding children and adults at risk who may come into contact with our people, premises, projects, work-experience activity, apprenticeships or community engagement. It establishes clear responsibilities for prevention, reporting, escalation and safer working.

2. Scope

This policy applies to employees, workers, agency workers, apprentices, work-experience participants, contractors, consultants and volunteers working for or on behalf of the Company. Contractual and statutory obligations may differ according to employment status and role.

3. Definitions

- Child: a person under the age of 18. Where there are safeguarding concerns relating to an unborn child, those concerns must also be escalated appropriately.
- Adult at risk: an adult who has needs for care and support (whether or not those needs are being met), is experiencing or at risk of abuse or neglect and, because of those needs, is unable to protect themselves from that abuse or neglect or the risk of it.
- Safeguarding: action to protect a person's right to live in safety, free from abuse, neglect and exploitation.
- Abuse or exploitation may include physical, sexual, emotional or psychological abuse, domestic abuse, financial or material abuse, discriminatory abuse, organisational abuse, modern slavery, neglect, self-neglect, coercive control, harassment or exploitation.

4. Legal and guidance framework

The Company will apply this policy consistently with applicable law and current statutory guidance. Relevant frameworks include the Children Acts 1989 and 2004, the Care Act 2014, the Safeguarding Vulnerable Groups Act 2006, the Rehabilitation of Offenders Act 1974, the Data Protection Act 2018 and UK GDPR as amended, Working Together to Safeguard Children 2026, and current DBS eligibility and referral guidance. Keeping Children Safe in Education will be considered only where it is relevant to the activity or setting.

5. Safeguarding leads

The Group will appoint Designated Safeguarding Leads (DSLs) and maintain current contact details through HR and internal communications. Where a named DSL is unavailable, concerns must be escalated to HR or a senior manager without delay. The identity of designated persons will be reviewed whenever responsibilities change.

6. Immediate danger and urgent action

If anyone is in immediate danger or a crime is in progress, employees must contact the emergency services first and then notify a DSL or HR as soon as it is safe to do so. A safeguarding concern must never be delayed while an internal investigation is started.

7. Reporting a concern

- Report concerns, disclosures, allegations or observed warning signs immediately to a DSL or HR.
- Record facts accurately, using the person's own words where possible. Do not investigate, promise secrecy or confront the alleged perpetrator.
- Information will be shared only with those who need it for safeguarding, legal or regulatory purposes.
- Where required, the Company will refer concerns to children's social care, adult safeguarding services, the police, the Local Authority Designated Officer (LADO), DBS or another competent authority.

8. Allegations involving a worker or contractor

Any allegation that a worker, contractor or volunteer has harmed, may have harmed, poses a risk of harm to a child or adult at risk, or may be unsuitable to work with them must be escalated immediately to HR and the DSL. The Company will consider external referral requirements before taking internal investigative steps that could compromise safeguarding enquiries.

9. Safer recruitment and DBS checks

The Company will assess safeguarding risk during recruitment and deployment. DBS checks will only be requested at the level for which the role is legally eligible. Where a role involves regulated activity, the Company will apply the relevant barred-list and referral requirements. A DBS certificate does not replace supervision, risk assessment or ongoing safeguarding controls.

10. Duty to refer to DBS

Where the statutory conditions are met, including where an individual has been removed from regulated activity because they harmed or posed a risk of harm, the Company will make a referral to the Disclosure and Barring Service. HR will coordinate any referral and obtain legal or safeguarding advice where required.

11. Work experience, apprentices and young people

Risk assessments, supervision arrangements, site access controls and appropriate behavioural boundaries must be in place before a child or young person starts work experience, training or site activity. Managers must consider age, maturity, lone working, travel, working time restrictions, hazardous work and safeguarding risk.

12. Training and awareness

Safeguarding training will be proportionate to role and risk. Employees in relevant roles will receive refresher training at appropriate intervals and when material guidance changes. Managers must ensure contractors and agency workers understand site reporting routes.

13. Information sharing and confidentiality

Safeguarding information is sensitive and must be handled securely. Data protection law does not prevent proportionate information sharing where it is necessary to protect a child or adult at risk. The Company will record the reason for material information-sharing decisions and follow its Data Protection Policy and retention requirements.

14. Non-retaliation and whistleblowing

No person will suffer retaliation for raising a safeguarding concern in good faith. Concerns about concealment, inaction or organisational wrongdoing may also be raised under the Whistleblowing Policy.

15. Related policies

- Code of Conduct
- Whistleblowing Policy
- Bullying, Harassment and Sexual Harassment Policy
- Equal Opportunities, Diversity and Inclusion Policy
- DBS / Safer Recruitment Procedure
- Modern Slavery and Human Trafficking Policy
- Data Protection, GDPR & Cyber Security Policy
- Disciplinary Policy
- Health and Safety Policy

16. Review

The Group Chief People Officer will review this policy at least annually and sooner where statutory guidance, safeguarding arrangements or operational risks change.

AUTHORISED AND SIGNED

SIGNED



Gavin Hunt
Chief Development Officer

Review: Annually
Date: 01/06/2026
Next Review: 01/06/2027

SIGNED



Martina Oyite
Chief People Officer

Review: Annually
Date: 01/06/2026
Next Review: 01/06/2027

*Review: Annually or earlier where legislation, guidance, Company practice or operational requirements change.
This policy is subject to annual review and approval by the Board.*