Safeguarding Policy (External facing - internal links removed)

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Rekindle exists to ignite a love of learning in young people who have lost their spark—empowering them to think critically, question the world around them, and grow in ways that bring both enlightenment and joy. Our youth-led, after-school provision supports working-class 11–14-year-olds, giving them the confidence and tools to re-engage with education on their own terms.

At the heart of Rekindle is a commitment to trust, connection, and hope. We create a space where young people feel safe, valued, and empowered to shape their own learning. Our safeguarding approach reflects this—ensuring that every student is protected, supported, and surrounded by adults and mentors who prioritise their well-being. With a board of trustees that includes young people aged 18 to 30, Rekindle is built on lived experience, shared responsibility, and an unshakable belief in the potential of every learner.

1. Scope of Policy

REKINDLE is determined to ensure that anyone who is involved in or connected to its work, particularly children, are safe from harm. This policy encompasses measures to protect everyone who comes into contact with REKINDLE or any of its work, including our staff.

It provides guidance on REKINDLE's approach to:

- Responding to concerns: Policy, procedures, and referrals.
- Raising awareness: Training, education, and best practice.
- Right people: Safe recruitment processes, including references and criminal record checks.

Children and young people

When we refer to children or young people in this policy, we mean anyone under the age of 25.

Staff, facilitators and volunteers

When we refer to staff we mean PAYE or contractors. facilitators or volunteers who might not be formal employees of Rekindle, but who agree to uphold the standards we set for safeguarding.

This also means creating a safe and supportive environment for the adults who come into contact with Rekindle. Staff, facilitators and volunteers should feel confident in their roles, clear about expectations, and able to raise concerns about any situation that feels unsafe — whether for themselves or for others.

Community members

Community members interacting with REKINDLE in any form, whether that's using our services or attending an event should have an experience which upholds the highest standard of safeguarding.

2. Shared Objective

Everyone who comes into contact with REKINDLE - young people, staff, volunteers, and those accessing our services - has the right to feel safe, respected, and protected from harm. This right stands regardless of age, gender, disability, culture, language, ethnicity, faith, or sexual orientation.

If something isn't right, we act. All concerns, disclosures, and allegations of abuse will be taken seriously and dealt with swiftly and appropriately. Safeguarding is a shared responsibility, and we work closely with parents, carers, local authorities, and other partners to keep everyone safe.

Everyone at REKINDLE has a role to play. Staff, volunteers and anyone working with or accessing our services must understand their safeguarding responsibilities.

3. Raising Awareness and Best Practice

Everyone at REKINDLE - whether staff, facilitators, volunteers, or those working on our behalf, has a shared responsibility to create a safe and supportive environment. That means promoting safe practices, calling out harmful behaviour, and always putting the well-being of young people first.

Safeguarding isn't just a policy - it's a commitment. Every young person who comes into contact with REKINDLE should feel protected, valued, and heard. If anyone suspects that a child, young person, or vulnerable adult is at risk of harm, they have a duty to speak up.

Anyone working directly with young people or handling their personal information, should have a clear understanding of safeguarding and protection procedures. Our safeguarding protocols apply to all REKINDLE spaces, whether we're running a project ourselves or working in partnership with others.

This policy will be publicly available on the REKINDLE website.

Please refer to Appendix 1 for more information on definitions, abuse, and neglect.

This safeguarding policy should be read alongside other staff policies, which provide additional support, guidance and context including:-

- Staff Handbook
- Equity, Diversity and Inclusion Policy
- Privacy & Data Protection Policy
- Health & Safety Policy
- Disciplinary and Grievance Policy

See Appendix 4 for links to Internal Policies and Guidelines.

At induction, all staff and volunteers will be made aware of these policies as well as REKINDLE's safeguarding practices, procedures and expected standards of conduct and behaviour.

Safeguarding training will be provided to new staff and refresher training will be delivered at regular intervals during employment. Staff with designated safeguarding responsibilities will be provided with additional training and support, appropriate to their role.

Hiring managers should be made aware of safe recruitment practices referred to Appendix 2.

Equality Statement

At REKINDLE, we recognise that some young people and adults face additional risks and barriers when it comes to safeguarding. Certain groups of children, for example, may struggle to recognise or disclose abuse due to their circumstances, and some adults also need extra protection. Vulnerability can take many forms and can change over time.

We are deeply committed to anti-discriminatory practice, embracing the diverse realities of those we work with. Everyone, no matter their background or situation, deserves equal protection and support. That's why we pay special attention to those who may face greater challenges, including children who:

- Have special educational needs or disabilities (SEND)
- Are young carers
- May experience discrimination due to race, ethnicity, religion, gender identification, or sexuality
- Have English as an additional language
- Are known to be living in difficult situations- for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are Asylum Seekers
- Are at risk due to either their own or a family member's mental health needs
- Are care-experienced

We also recognise that adults can be vulnerable too. Factors like age, health conditions, social isolation, financial difficulties, and abuse, including financial abuse, can all increase vulnerability.

At REKINDLE, we are dedicated to safeguarding everyone we work with, ensuring that each person receives the support and protection they need based on their unique circumstances.

4. Roles and Responsibilities

Safeguarding is everyone's responsibility. All staff (PAYE or Contractors), facilitators and volunteers must be familiar with this policy and REKINDLE's safeguarding procedures as part of their induction.

Organisation-wide responsibilities

All staff, facilitators and volunteers must:

- Understand and follow the safeguarding procedures outlined in this policy.
- Complete safeguarding training and refresh their knowledge regularly.
- Ensure compliance with staffing ratios, where applicable (which can be found in the site-specific information).
- Share safeguarding concerns promptly, ensuring timely action (see reporting mechanisms).

Information Sharing and Confidentiality

- Timely information sharing is essential - concerns about confidentiality must never prevent action to protect a child's welfare.
- The Data Protection Act (DPA) 2018 and GDPR do not restrict sharing information when it is necessary for safeguarding.
- If special category personal data must be shared, the DPA 2018 allows disclosure without consent in cases where:
    - It is not possible to obtain consent.
    - Seeking consent would not be reasonable.
    - Gaining consent could put a child at risk.
- Staff must never promise confidentiality to a child when receiving a disclosure of abuse, as this may not be in the child's best interests.
- The government's seven 'golden rules' for information sharing provide guidance for staff making decisions about disclosures.
- Confidentiality in record-keeping is addressed in section 12, and procedures for handling allegations against staff are detailed in

Appendix 3.

Board of Trustees

REKINDLE's Trustees have a duty of care to the organisation, which includes:

- Ensuring all reasonable steps are taken to safeguard children and young people from harm.
- Managing risk and maintaining oversight of safeguarding policies and practices.
- Protecting the reputation and integrity of REKINDLE by upholding best practices in governance and compliance.

While Trustees may delegate the day-to-day safeguarding responsibilities to designated roles within the organisation, they retain ultimate accountability for safeguarding. This includes regular review and assurance that policies are implemented effectively, risks are managed, and appropriate safeguarding culture is embedded throughout REKINDLE.

Darren Crosdale (Board Co-Chair) is the designated Safeguarding Trustee for REKINDLE.

Senior Management Leads

The Senior Management Leads (SMLs) are accountable to the Board of Trustees for all safeguarding matters. Their responsibilities include:

- Embedding safeguarding as a core principle in all organisational decisions, policies, and practices.
- Ensuring compliance with statutory requirements and national safeguarding standards.
- Providing oversight, guidance, and support to the Designated Safeguarding Leads in the event of a safeguarding concern.
- Notifying the Designated Safeguarding Trustee of any safeguarding incidents, either on a regular basis or immediately for more urgent or serious matters.

Your SMLs are the CEO and Director level staff members.

Designated Safeguarding Leads

Each REKINDLE school will have two Designated Safeguarding Leads (DSLs) who are responsible for:

- Acting as the primary safeguarding contacts for their site.
- Responding to safeguarding concerns and escalating issues as necessary.
- Ensuring staff and volunteers at that site receive safeguarding training and understand reporting procedures.
- Maintaining accurate safeguarding records and ensuring compliance with local and national safeguarding protocols.

A list of current Designated Safeguarding Leads (DSLs) for each school can be found in the site-specific information document.

5. Reporting mechanisms

Concerns

A concern is something that doesn't amount to a disclosure but still feels important to note. Logging these will help us keep track of patterns, join up information across the team and flag anything that might need a closer look.

Each location (London, Manchester & Dundee) has its own log to flag these concerns which can be found in the share drive.

Disclosures

A disclosure is when someone tells you something that suggests a child or adult is at risk of harm, either to themselves or to others. All staff and volunteers must follow the procedures below if they become aware of a safeguarding concern.

If someone makes a safeguarding disclosure to you:

You will choose one of three disclosure forms depending on who the disclosure relates to. All forms can be found in the Internal Hub > Forms and templates > Safeguarding:

- Child and young person disclosure form
- Staff disclosure form
- Volunteer disclosure form

If there is an immediate danger, call 999 or make a referral to the appropriate social care service. Details of referral mechanisms for each REKINDLE school/area can be found in the site-specific information document.

While the Designated Safeguarding Lead (DSL) should take the initial report wherever possible, we recognise this may not always be feasible. Every member of staff should feel confident in receiving a disclosure by following these steps:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Reassure them that they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will need to pass this information on. Do not promise to keep it a secret.
- Write up your conversation into the disclosure form as soon as possible, using their own words. Stick to the facts and avoid adding personal judgment.
- Sign and date the write-up and pass it on to the DSL.

Next Steps:

- If you are not the DSL, submit the disclosure form to the Designated Safeguarding Lead (DSL) without delay.
- The DSL will take any immediate action needed and report it to the Senior Management Lead (SML) where necessary.
- The DSL will document their next steps in the DSL Action Log & Follow-Up Form.
- The SML will help determine any next steps, including whether the Safeguarding Trustee needs to be informed and ensure REKINDLE's safeguarding procedures are followed.

A poster detailing the contact information for the DSL, SML and Safeguarding Trustee should be up in school and be made known to all individuals accessing REKINDLE services.

Reporting to the board, regulators and other third parties

If necessary, the DSL will inform the SML when a safeguarding disclosure is made. The SML will support and advise the DSL and decide whether matters need to be escalated to the Safeguarding Trustee, who is responsible for deciding whether the matter should be reported to REKINDLE's regulator, the Charity Commission. Trustees may delegate authority to make a report to the designated safeguarding trustee, the SML, the DSL, or an external agent (for example, a lawyer).

SML will keep the Board of Trustees regularly updated on safeguarding

concerns and the processes followed to ensure the Board has the necessary oversight.

Notifying a young person's school and parents/carers

Where appropriate, we will discuss any concerns about a child with the child's parents/carers and/or school. The DSL would normally do this in the event of a disclosure or if a concerning pattern of behaviour has been identified, and work with relevant parties to support the child/young person. Other staff will only talk to parents/carers about any such concerns following consultation with the DSL. If we believe that notifying the parents/carers would increase the risk to the child or young person, we will discuss this with the local authority children's social care team before doing so. In the case of allegations of abuse made against other children, we will normally notify the parents/carers and schools of all the children involved, unless recommended not to by safeguarding authorities.

Details of referral mechanisms for each REKINDLE school/area can be found in the site-specific information document.

6. Allegations about a Staff Member or Volunteer

This section of the policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed an individual (child or adult), or may have harmed an individual (child or adult), or
- Possibly committed a criminal offence against or related to an individual (child or adult), or
- Behaved towards an individual (child or adult) in a way that indicates he or she would pose a risk of harm to others.

If you're concerned about the behaviour of a staff member or volunteer, or if an allegation is made that they may pose a risk of harm to a child or vulnerable adult, please follow the steps outlined in Appendix 3.

If your concern is about a Designated Safeguarding Lead (DSL), report it immediately to the CEO.

If your concern is about the DSLs or CEO, contact the Board Co-Chair and Safeguarding Trustee, Darren Crosdale, at Darren@rekindleschool.org. They will then follow the steps in Appendix 3, if necessary.

7. Peer-on-Peer Abuse and Online Safety

At REKINDLE, we are committed to ensuring the safety and wellbeing of all participants. Abuse, including peer-on-peer abuse, will never be tolerated or dismissed as "banter" or "just having a laugh." We recognise that peer-on-peer abuse can be gendered but will treat all incidents seriously, regardless of those involved.

This policy outlines our approach to managing allegations of abuse between participants and our commitment to online safety.

Responding to Allegations of Peer-on-Peer Abuse

Most incidents will be handled under our behaviour policy. However, this safeguarding policy applies to allegations that raise significant safeguarding concerns, including:

- Potential criminal offences
- Risks to the safety of participants
- Violence
- Coercion involving drugs or alcohol
- Sexual exploitation, abuse, or harassment

If an allegation is made:

1. Report it immediately to the Designated Safeguarding Lead (DSL). Do not investigate it yourself.
2. The DSL will assess the situation, consult with the SML's and external safeguarding authorities if necessary, and follow relevant procedures.
3. A risk assessment and support plan will be put in place for all involved.
4. If required, the DSL will liaise with police, social care, or mental health services.

Preventing Peer-on-Peer Abuse

We will minimise the risk by:

- Challenging derogatory or sexualised language and behaviour.
- Being vigilant to gender-specific risks (e.g., unwanted touching, initiation violence).
- Educating participants on appropriate behaviour, boundaries, and consent.
- Ensuring participants have trusted staff they can talk to.
- Training staff to recognise when harmful behaviour may indicate underlying abuse.

Sexting and Youth-Produced Sexual Imagery

If staff become aware of an incident involving sexting:

- Report immediately to the DSL. Do not view, share, or delete any images.
- The DSL will conduct an initial assessment and determine next steps.
- If necessary, the DSL will refer the incident to police/social care.
- Parents/carers will be informed unless doing so increases risk.

REKINDLE will educate participants on:

- The legal and emotional consequences of sexting.
- Strategies for handling pressure to share images.
- Online safety and digital responsibility.

Online Safety

We recognise the opportunities and risks of the online world. REKINDLE is committed to safeguarding young people as they navigate online spaces, ensuring a safe and positive digital environment that promotes responsible online behaviour. We will seek to keep young people safe online by:

- Ensuring staff and young people are encouraged to engage online in a way that is safe, respectful, and in line with REKINDLE's safeguarding principles.
- Ensuring staff use work devices for communication with individuals.
- Implementing robust security measures to protect personal data.
- Ensuring children and young people feel able to report concerns such as cyberbullying or online grooming to a trusted adult.

If online abuse occurs, we will:

- Follow safeguarding procedures to address the issue.
- Support those affected and take appropriate action.
- Regularly review and improve our online safety measures.

Legal and External Guidance

This policy aligns with relevant UK legislation and safeguarding guidance, including NSPCC best practices. Further information can be found at:

- Online Abuse
- Bullying
- Child Protection

8. Individuals with Special Educational

Needs and Disabilities (SEND)

We recognise that individuals with SEND can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Participants being more prone to peer group isolation than other participants
- The potential for young people with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

9. Mobile Phones and Cameras

Staff and volunteers are allowed to bring their personal phones to REKINDLE for their own use, but will limit such use to non-contact time when children are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with children. Staff will not take pictures or recordings of participants on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for internal use. In all cases, prior consent will be obtained from young people (and from parents/carers where appropriate) before any photos or recordings are made or used.

While we acknowledge that young people are likely to own mobile phones, these will be allowed on the premises but must be used responsibly. Staff leading sessions with young people will remind them to use their phones responsibly and ensure they do not interrupt sessions or are used to make other individuals feel uncomfortable. Young people will be advised that no photography or recording with these or other devices is allowed at any time.

10. Complaints and Concerns about Rekindle Safeguarding Policies

Complaints against staff: Complaints against staff or volunteers that are likely to require a child protection investigation will be handled in accordance with **our procedures for dealing with allegations of abuse made agains**

staff (see Appendix 3).

Other complaints: Should be addressed through our Complaints procedure. Please refer to our Whistleblowing policy (see appendix 4).

11. Record Keeping

We will maintain records on young people's reasons for referral, their application process, and monitoring by REKINDLE staff regarding their conduct and progress while engaged with REKINDLE. All safeguarding concerns, discussions, decisions, and the reasons behind those decisions must be recorded in writing. This will allow staff to analyse patterns over time. If you're unsure whether something should be recorded, consult the relevant Designated Safeguarding Lead (DSL).

Retention of Records

- Non-confidential records: These will be easily accessible to REKINDLE staff as needed.
- Confidential records: These will be stored securely and only accessible to those with a legitimate professional need to view them. Completed Safeguarding Disclosure Forms should not be stored on personal devices. They should be shared with the DSL and deleted from personal drives as soon as possible.

Safeguarding records will be retained as follows:

- Records relating to safeguarding concerns, disclosures, or incidents will be retained until the individual reaches the age of 25, in line with best practice and statutory guidance.
- General safeguarding-related records (e.g., routine welfare discussions or monitoring that does not indicate a safeguarding concern) will be retained for three years after the young person leaves REKINDLE, unless linked to a specific concern, in which case the longer retention period applies.

***Appendix 2**: Details our policy on record-keeping for recruitment and pre-employment checks.*

***Appendix 3**: Outlines our policy on record-keeping for allegations of abuse made against staff.*

12. Training

All staff members and volunteers will undertake safeguarding training during induction, which will cover the organisation's safeguarding policy, whistleblowing procedures, and the processes for reporting concerns. This ensures staff understand their specific responsibilities, the safeguarding systems in place, and how to identify signs of abuse or neglect. The training will be regularly updated in line with statutory guidance, so staff remain well-informed and confident in their roles.

13. Recruitment

REKINDLE is committed to the safe recruitment, selection, and vetting of staff, trustees, and volunteers. We will take all reasonable steps to ensure unsuitable people are prevented from working with children and young people. We follow safe recruitment procedures to ensure that appropriate checks are carried out:

- Checks on prospective trustees to ensure that they are not disqualified under charity automatic disqualification rules. Trustees in post will be asked to sign a fresh declaration every year.
- Role profiles highlight key responsibilities of the role, including any specific safeguarding duties and obligations.
- Asking specific questions at interviews to explore attitudes and values in relation to safeguarding children and young people.
- Inviting an open and measured discussion with applicants at interview about any offences or other matters that might be relevant to the position applied for, including questioning any gaps in employment.
- Undertaking identity checks prior to commencement of the engagement by obtaining relevant documentation (such as passport, driving licence, etc.).
- Criminal records checks to be carried out, where appropriate, determined by the level and nature of the role.
- Taking up two references for all successful candidates.
- Appropriate and proportionate due diligence checks, determined by the level and nature of the role.

Hiring managers will be responsible for ensuring that recruitment is carried out in accordance with REKINDLE's recruitment policy and process. All staff members will know where the Safeguarding Policy is stored. It will also be made readily available to anyone interacting with REKINDLE.

13. Partners

REKINDLEwill ensure that all partners that work with our organisation have suitable policies in place, which line up with REKINDLE's values and beliefs.

We will carry out due diligence checks on third party organisations that we partner with. All contractual partnerships with individuals, groups or organisations which involve contact with children or young people will:-

- include an obligation on the partner to have appropriate safeguarding policies and procedures in place, and to comply with its statutory and regulatory safeguarding obligations; and

- clearly outline procedures and standards including: who has overall responsibility for safeguarding concerns; who is responsible for reporting and investigating safeguarding concerns; and the procedure to be following for dealing with safeguarding concerns.

If a safeguarding report is made to REKINDLE about a partner organisation, we will contact the partner and will expect them to respond appropriately.

We will provide reasonable assistance to our partner.

REKINDLE will require partner organisations to provide information on the outcome of safeguarding investigations (as permitted under data protection laws). If we have reason to believe that a safeguarding concern has not been dealt with appropriately by the partner organisation and/or if the investigation uncovers serious issues relating to the governance or management of the organisation, REKINDLE may end the partnership.

Appendix 1: Definitions and recognising types of abuse

Definitions

Child Protection: Activities aimed at preventing children from suffering or being at risk of significant harm.

Abuse: Maltreatment of a child that may involve causing harm or failing to act to prevent harm.

Safeguarding and Promoting the Welfare of Children:

- Protecting children from maltreatment.
- Preventing the impairment of children's health or development.
- Ensuring children grow up in safe, effective care.
- Enabling children to have the best possible outcomes.

Important Definitions for this Policy

- Child: Any person under 18 years old (United Nations Convention on the Rights of the Child, 1989).
- Vulnerable Adult: Any adult aged 18 or over, in need of care or support, experiencing or at risk of abuse, and unable to protect themselves (Safeguarding Vulnerable Groups Act 2006, section 59).
- Child Abuse: Includes physical, emotional, and sexual abuse, exploitation, and neglect, all of which can cause harm to a child's health, well-being, or development.
- Harm: Any injury or damage to a child's health, survival, development, or dignity.
- Safeguarding: Protecting both adults and children from abuse, ensuring safe care, and enabling positive outcomes (Charity Commission for England and Wales, 2017).
- Domestic Abuse: Includes controlling, coercive, or threatening behaviour, violence, or abuse between intimate partners or family members aged 16+.
- Financial Abuse: Theft or exploitation for personal gain, such as modern slavery or coercion to make donations.
- Harassment: Unwanted conduct related to protected characteristics, including sexual harassment, which creates an intimidating or degrading environment (Equality Act 2010).
- Serious Incidents: Events that result in significant financial loss, harm, or damage to REKINDLE's reputation or operations.

- Staff: Individuals employed by REKINDLE, including contractors, consultants, and volunteers.
- Clients: Individuals or organisations that have entered into a service agreement with REKINDLE.
- REKINDLE: Refers to Rekindle School Limited (UK registered charity, RCN: 1192950).
- Sexting: Sharing of sexual imagery by children.

Types of Abuse

Neglect: Persistent failure to meet a child's physical or psychological needs, leading to serious impairment of their health or development. This can include inadequate food, shelter, supervision, and care.

Physical Abuse: Includes hitting, shaking, poisoning, burning, or other forms of harm. It can also involve fabricating symptoms or inducing illness in a child.

Emotional Abuse: Persistent emotional maltreatment that harms a child's emotional development. This includes belittling, silencing, or imposing inappropriate expectations, as well as bullying (including cyberbullying).

Sexual Abuse: Forcing or enticing a child into sexual activities, which can include physical contact (rape, sexual assault) or non-contact activities (producing sexual images, grooming).

County Lines and Criminal Exploitation: Involves children being exploited by criminal gangs to transport and sell drugs. This often involves coercion, violence, and puts children at risk of physical and emotional harm.

Other Safeguarding Issues

- **Female Genital Mutilation (FGM)**: Any partial or total removal of the female genitalia, or injury to the female genital organs. FGM is illegal in the UK and is a form of child abuse with long-lasting consequences.
- **Forced Marriage**: A marriage without the free and full consent of one or both parties, often involving threats or coercion.
- **Preventing Radicalisation**: The process by which a person begins to support terrorism and extremism. Signs include changes in behaviour, isolation, and exposure to extremist content.

Procedure for Addressing Abuse and Safeguarding Concerns:

- **Immediate Action**: If abuse or neglect is suspected or identified, staff must report concerns to the Designated Safeguarding Lead (DSL) immediately. In cases of suspected FGM or forced marriage, the police must be contacted.
- **Referral Process**: If a child is at risk, staff must follow local safeguarding procedures and escalate concerns to appropriate agencies, such as children's social care or the police.

Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

We will record all information on the checks carried out. Copies of these checks, where appropriate, will be held in individuals' files. Volunteers will have files as well as paid staff. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff: When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought. We will ask for written information about previous employment history and check that information is not contradictory or incomplete. We will seek references on all short-listed candidates, including internal candidates, before the interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity: Means a person who will be:

- Responsible, on a regular basis in a CIC or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a CIC or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff: If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is. We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left the Agency.

Third-party staff: We will obtain written notification from any agency or third-party organisation (e.g. bus service) that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors: We will ensure that any contractor, or any employee of the contractor, who is to work at REKINDLE has had the appropriate level of DBS check. This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months. Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival on site. For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Volunteers: We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Appendix 3: Allegations of Abuse Made Against Staff

This policy applies regardless of whether the alleged abuse took place on site or elsewhere. Allegations against a member of staff or volunteer who is no longer with REKINDLE, or any historical allegations of abuse, will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer swiftly and in a fair and consistent manner. This ensures effective protection for those involved while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgment. Suspension will not be the default position but will be considered in cases where there is reason to suspect that an individual (child or adult) is at risk of harm, or if the case is serious enough to warrant dismissal.

Definitions for outcomes of allegation investigations:

- **Substantiated**: There is sufficient evidence to prove the allegation.
- **Malicious**: There is sufficient evidence to disprove the allegation and it is clear that there was a deliberate attempt to deceive.
- **False**: There is sufficient evidence to disprove the allegation.
- **Unsubstantiated**: There is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded**: There is no evidence or proper basis to support the allegation being made.

Procedure for dealing with allegations:

1. Initial Response

If an allegation is made against a member of staff or volunteer:

- The onsite DSL will immediately escalate the matter to the CEO.
- The CEO will review the nature, content, and context of the allegation and decide:
    - Which local authorities need to be informed.
    - Whether police or children's social care services need to be involved.
    - Whether to report to the Safeguarding Trustee, who will decide if the Charity Commission needs to be informed.

In urgent cases where a child or adult is at immediate risk, the DSL may contact the police first and notify the CEO as soon as possible.

2. Informing the Accused Individual:

- The CEO will decide who informs the accused individual, depending on the severity of the case.
- The accused will be informed of the concerns and next steps after consultation with the relevant authorities (police/children's social care if applicable).
- Information shared will align with advice from these agencies.

3. Suspension Considerations:

Suspension is not the default response but will be considered where:

- An individual (child or adult) is at risk of harm.
- The case is serious enough that it might result in dismissal.

The CEO, in consultation with the DSL, will:

- Carefully assess whether suspension is necessary or if alternative arrangements can be made.
- Seek advice from local authorities and/or police as appropriate.
- If suspension is necessary, document the rationale and alternative options considered.
- Provide written confirmation of suspension within 1 working day.

4. Investigation & Resolution:

- If no further action is required, the CEO will record the decision and agree on next steps with the Safeguarding Trustee.
- If further action is required, they will follow the appropriate internal or external processes, liaising with relevant authorities.
- The accused individual will be supported throughout the process, including appointing a named representative to keep them informed.

5. Parental Notification:

- The CEO will inform the parents/carers or carers of the child/children involved once agreed with the relevant authorities.
- parents/carers will be updated on case progress and outcomes, except where a criminal investigation prevents this.
- parents/carers will be reminded of confidentiality requirements during ongoing investigations.

Referral to DBS:

- If a member of staff or volunteer is found to have harmed a child or poses a risk of harm, a referral will be made to the Disclosure and Barring Service (DBS).

Timescales:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days
- A disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Record-keeping:

For any case that meets the criteria above:

- The DSL will maintain records for cases they manage directly.
- If the matter escalates higher than the DSL, the CEO will maintain records for cases where they are involved.
- Records will be stored on the individual's confidential personnel file and include:
    - A clear summary of the allegation.
    - Details of how the allegation was followed up and resolved.
    - Notes of any actions taken and decisions made, including justifications.

If an allegation or concern is not found to have been malicious, REKINDLE will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached pension age, or for 10 years from the date of the allegation if that is longer. The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References: When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning Lessons: After any cases where the allegations are substantiated, we will review the circumstances of the case to determine whether there are any improvements that we can make to our procedures or practice to help prevent similar events in the future - where needed we will consult any local authorities involved in the case. This will include consideration of (as applicable):

- **Whether procedural improvements** can be made.
- **Suspension decisions** – duration, justification, and handling.
- **How similar investigations could be handled differently in the future.**

Appendix 4: Useful resources

Legislation and Guidance

This policy is underpinned by following legislation and guidance:

Legislation	
United Nations Convention on the Rights of the Child 1991 United Nations Convention on the Rights of the Child (UNCRC): how legislation underpins implementation in England	International human rights treaty covering all aspects of a child's life. Legislation, case law and policy that demonstrate how children's rights, set out in the UNCRC, are protected in England.
Children Act 1989 and Children Act 2004	Establish key principles including the paramount nature of the child's welfare and the expectations and requirements around duties of care to children.
Sexual Offences Act 2003	Introduced new offences concerning children.

Safeguarding Vulnerable Groups Act 2006	Introduced the new Vetting and Barring Scheme and the role of the Independent Safeguarding Authority. Places a statutory duty on all those working with vulnerable groups to register and undergo an advanced vetting process with criminal sanctions for non-compliance.
Children and Social Work Act 201	Amended the Children Acts, established the Child Safeguarding Practice Review Panel and new local safeguarding partner structures.
Children and Families Act 2014	An Act to make provision about children, families, and people with special educational needs or disabilities; to make provision about the right to request flexible

	working; and for connected purposes.
Guidance	
Department for Education: Working Together to safeguarding children Department for Education: What to do if you're worried a child is being abused – advice for practitioners Charity Commission: 'Safeguarding and protecting people for charities and trustees'	https://www.gov.uk/government/publications/working-together-to-safeguard-children--2 https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2 https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees
Charity Commission: 'How to report a serious incident in your charity'	https://www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity
Charity Commission: 'Reporting a serious incident in your charity when it involves a partner'	https://www.gov.uk/guidance/reporting-a-serious-incident-in-your-charity-when-it-involves-a-partner

Charity Commission: Trustee board - people and skills	https://www.gov.uk/guidance/trustee-board-people-and-skills#full-publication-update-history

NVCO: The legal duties of trustees	ees-are eligible https://www.ncvo.org.uk/help-and-guidance/governance/responsibilities-for-boards/the-legal-duties-of-trustees/
Charity Commission: 'Automatic Disqualification: guidance for charities'	https://www.gov.uk/guidance/automatic-disqualification-rule-changes-guidance-for-charities

Charity Commission: 'Charities: due diligence, monitoring and verifying the end use of charitable funds'	https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds

Review and Version Control

The policy and processes will be reviewed on an annual basis, or in the following circumstances:

- Changes in legislation and/or government guidance
- As a result of any other significant change or event

Version	Author of change	Type of change made	Amendments approved by Board	Date
V2025	Sam Pow	Policy rewrite	Full Board approval	March 2025
V2025	Sam Pow	Small tweaks to reporting mechanisms	Safeguarding Trustee approved	Dec 2025