



SAFEGUARDING POLICY

The Stirling School of English SCIO (SSoE) is an organisation for cultural relations and educational opportunities. In our work we meet adults and children who are potentially at risk for a variety of reasons. We aim to create a safe environment in which no child or adult will experience harm or exploitation during their contact with us. SSoE aims to provide low-cost English language tuition to all whose first language is not English. It also provides a crèche service for students with pre-school children and may also teach young non-native speakers referred to us by high schools. Please note that parents are in the same building and take their children to the toilet and/or change nappies, look after them during breaks and feed their children snacks.

SSoE is concerned to safeguard the wholeness and the well-being of every person in our school of whatever age. It is the responsibility of each one of us to prevent the physical, sexual or emotional abuse of every member of our school, and particularly the abuse of those most vulnerable among us, including children and young people.

The purpose of this Policy is to outline the commitment of the SSOE in its duty to safeguard children, young people and vulnerable adults who may be at risk of harm, abuse, neglect, exploitation, discrimination or extremism.

This Policy applies to all staff, students, stakeholders, volunteers, agency workers and any other contractor/consultant who may be engaged by the SSOE. This Policy recognises the SSoE duty to safeguard children, young people and vulnerable adults and, as the SSoE does not operate wholly or mainly in the areas of child and/or adult protection, to work closely with those practitioners and professional organisations who do work within this area.

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SUMMARY

This Policy sets out the broad framework and expectations relating to safeguarding children and adults. It articulates why safeguarding is important and the actions the SSoE will take to meet its responsibilities when interacting with children and adults.

SSoE requires all staff to immediately report safeguarding concerns to a Safeguarding Officer- Ilona Hunter (**Ilona Hunter, admin@stirlingschoolofenglish.com, 07742514087**). This Policy is intended to compliment and reinforce other SSoE Policies and Procedures that are relevant to Safeguarding – including Health & Safety, Equality, ICT E-Safety and Data Protection which are available on our website. The SSoE will review this Policy annually to reflect new legal and regulatory developments.

BACKGROUND

In previous years, the SSoE has held two separate adult and child protection policies in line with existing UK legislation. In 2024 the Safeguarding Policy amalgamated the Child Protection and the Adult Protection Policy into this one document.

DEFINITIONS

For ease of reading the Policy, and to prevent having to repeat lengthy definitions throughout, the following terms are used:

Child:

A child is defined as anyone who has not reached their 18th birthday. We use the definition of a child according to international law as set out in the United Nations Convention on the Rights of the Child (UNCRC), 1989.

Adult:

An adult is defined as:

- any person aged 18 years or over.
- anyone who is identified or who identifies themselves as unable to take care or protect themselves against significant harm, exploitation, or neglect, or is understood to be at risk, which may be due to frailty, homelessness, mental or physical health problems, learning or physical impairments, and/or impacted by disasters or conflict.
- It is important to consider that any adult can be at risk, and this might be a temporary or ongoing situation depending on the protective factors around them.

Staff:

The term staff applies to paid and unpaid staff and volunteers engaged on a one-off, short, or long-term basis. It also covers consultants and contracted temporary personnel.

Partners, Suppliers & Contractors:

The terms 'partners, suppliers and contractors' relate to all those who we have a contract or agreement with to provide goods, services, or collaboration. There may be a financial or alternative benefit, but this is not essential. It includes implementing partners who carry out work on our behalf and other stakeholders with whom the SSoE may establish a working relationship, such as Churches, and Donors and Funders.

Safeguarding:

In the context of this Policy, 'safeguarding' does not mean preventing accidents (covered by our Health and Safety Policy) or making sure that a child's rights (as defined in the UNCRC) and human rights (as defined in the Universal Declaration of Human Rights) are fully implemented. Instead, we are referring specifically to the protection of children and adults from abuse.

Child Abuse:

The general definition of child abuse adopted in Scottish Office guidance¹ refers to circumstances where "a child or young person's basic needs are not being met in a manner which is appropriate to his or her individual needs and stages of development and the child is, or will be, at risk through avoidable acts of commission or omission on the part of their parent(s), sibling(s) or other relative(s) or a carer (i.e. the person(s) while not a parent who has actual custody of, charge of, or control over a child)."

¹ Protecting Children – A Shared Responsibility – Guidance on inter-Agency Cooperation, Scottish Office 1998

Adults at risk:

Adults can be at risk of harm from a variety of factors. Adult ESOL learners may be at greater risk of harm due to not having language skills or knowledge of life in Scotland, or because of additional social factors, such as poverty, immigration, human trafficking. Adults may be scarred by previous, or current, trauma and abuse.

The Adult Support and Protection (Scotland) Act 2007 was introduced to protect adults from risk of harm. 'Adults at risk' are defined as, adults who:

- are unable to safeguard their own wellbeing, property, rights or other interests
- are at risk of harm and
- because they are affected by disability, mental disorder, illness or other physical or mental infirmity are more vulnerable than adults not so affected

Adults can also be at risk if:

- another person's conduct is causing (or likely to cause) the adult to be harmed, or
- the adult is engaging (or is likely to engage) in conduct which causes (or is likely to cause) self-harm

Learners, just because their first language is not English, do not fall into this category. However, refugees and asylum seekers and adults who have had traumatic experiences might fall into this category.

Adult Safeguarding:

Safeguarding adults means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to both prevent and respond to risks and experiences of abuse or neglect, while at the same time making sure the adult's wellbeing is promoted, including where appropriate, having regard to their views, wishes, feelings and beliefs in deciding any action.² Safeguarding adults involves reducing or preventing the risk of significant harm in relation to neglect or abuse, while also supporting people to maintain control of their own lives.

Sexual Exploitation Abuse and Harassment:

Sexual Exploitation, Abuse and Harassment (SEAH) is a distinct category of harm that poses unique risks to vulnerable individuals and populations, including children, adults, refugees and displaced persons. By incorporating SEAH guidance in the Policy, the SSoE explicitly recognises and addresses the specific risks, ensuring that individuals are better protected within the organisation's activities and programmes. It also signals our commitment to accountability, transparency and responsible conduct and ensures the Stirling School of English takes proactive steps to prevent its staff volunteers and partners from being complicit in acts of exploitation and abuse. Emphasising SEAH in this Policy seeks to promote a culture of respect, equality and non-discrimination, discouraging harmful behaviours.

² Care Act (DH, 2014a) <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance>

INTRODUCTION

The definitions of safeguarding that guides our work in the SSoE are taken from the statutory guidance below:

- Safeguarding children as defined in Working Together to Safeguard Children 2018-2022
- Safeguarding adults at risk as defined in the Care and Support Statutory Guidance issued in the Care Act 2014
- Protecting Children – A Shared Responsibility – Guidance on inter-Agency Cooperation, Scottish Office 1998

Our Policy considers two levels of intervention:

- **PREVENTATIVE** – to reduce the likelihood of a child or an adult being harmed or abused.
- **RESPONSIVE** – taking actions to ensure where concerns are raised or situations of suspected harm or abuse are identified, appropriate steps are taken to ensure the child, or an adult is supported. And to prevent or reduce the likelihood of similar situations reoccurring.

CULTURAL SENSITIVITY

The SSoE aims to work in ways which are culturally sensitive and respect the diverse nature of the people we work with. We will seek to safeguard children and adults in ways which are sensitive and appropriate to their context.

The SSoE's belief that "everyone everywhere matters" reflects our commitment to valuing the dignity, rights, and wellbeing of all individual, regardless of their background or circumstances. This foundational principle affirms our dedication to promoting a safe and inclusive environment for everyone we engage with, be it children or adults. The assertion that "culture must never be used as a reason to abuse children or adults" underscores the SSoE's stance against cultural relativism when it comes to safeguarding vulnerable people. This means that cultural practices or beliefs should never be used as a justification or excuse for harmful behaviours, including sexual exploitation, abuse, or harassment, regardless of cultural norms or traditions.

PURPOSE

The purpose of this Policy is to:

- ensure that the SSoE exercises its duty of care to safeguard children and adults.
- implement suitable recruitment and enrolment procedures for appointing staff and volunteers that ensure reasonable steps are taken not to appoint people who are unsuitable to have contact with vulnerable adults or children. This process will also ensure that anyone formally disqualified for working with protected adults or children will not be either employed by or allowed to volunteer with the Organisation.

- ensure that all staff and volunteers are understand their responsibility to safeguard adults and children, including their responsibility to refer concerns to Stirling Council's Social Care Direct, in line with our Adult Protection Procedures.
- ensure all staff and volunteers understand and adhere to Safeguarding Policy and procedures.
- clarify roles and responsibilities of reporting and recording concerns.
- promote the rights of adults and children to be listened to and to be taken seriously so that they are able to express their views, thoughts and concerns.
- ensure that staff and volunteers are provided with support and the opportunities to develop their skills and knowledge in relation to safeguarding issues.
- clarify definitions of adult and child protection issues and abuse.
- provide guidance on reporting suspected abuse.
- provide guidance on confidentiality.
- provide guidance on recognition and signs of abuse.

SCOPE

- All staff partners, suppliers and contractors

PRICIPLES

There are several key pieces of legislation and guidance that inform the principles underpinning this Policy, and our practice in relation to safeguarding children and adults. These include:

- The Children Act 1989/2004 and 2007
- United Nations Convention on the Rights of the Child 1989
- Working Together 2018 – 2022
- The Care Act 2014
- Human Rights Act 1998
- Keeping Children Safe in Education 2022
- FCDO Safeguarding Strategy Against Sexual Exploitation & Abuse 2020

The following section outlines our principles and values when safeguarding children and adults.

Children

- Best interest of the child is paramount and shall be the primary consideration in our decision making.
- Respect for children's rights, including the right to protection and the right to participate in decisions affecting their lives, as enshrined in the UNCRC 1989.
- Equality of opportunity to ensure that all children can enjoy SSoE activities safely regardless of their gender, ability, race, ethnicity, circumstances, or age. Vulnerable children require particular attention to optimise their safety and protection and promote their access to opportunities.
- Consultation with children and their families regarding the implementation of the Policy

and procedures developed to support its implementation.

- Cultural sensitivity and recognition of local context in decision making and in informing our procedures.
- Accountability and being responsible to meet our obligations regarding our duty of care towards children and acting where we believe that a child is at risk or has been harmed.
- Working in an honest and transparent way by informing those we work with, including children, about our Safeguarding Policy, and explaining how we work to safeguard them.
- Ensuring confidentiality to protect sensitive personal data. Information will only be shared on a need-to-know basis - access to information must be necessary solely for the purpose of conducting official duties.
- Working together to safeguard children both in the SSoE and with other organisations. This includes law enforcement and specialist child welfare agencies where necessary

Adults

- Empowerment: people are supported and encouraged to make their own decisions and to give informed consent.
- Mitigation: SSoE has engaged in developing a range of tools and approaches to identify and mitigate potential risk. These resources will be disseminated to appropriate managers to ensure the identification and management of risk.
- Proportionality: the least intrusive response appropriate to the risk presented. Protection: support and representation for those in greatest need.
- Respond Quickly: services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting, and reporting safeguarding concerns.
- Accountability: accountability and transparency in delivering safeguarding.

PREVENTATIVE ACTIONS

The key to safeguarding is abuse prevention. It is widely recognised that organisational awareness and good practice can promote positive staff actions, reduce opportunities for offending and enable earlier detection and response to safeguarding concerns. Design, development and delivery of programmes and projects that have not appropriately and proactively assessed safeguarding risk can negatively impact children and adults who may directly or indirectly be harmed because of our activities. The following areas outline the ways in which this policy will be implemented across the organisation, in addition to the systems in place to support abuse prevention, so that children and adults are not harmed during their contact with the SSoE.

INFORMATION AND TRAINING

To ensure the effective implementation of the Safeguarding Policy into action, following appointment, all staff, partners and contractors will be given training on our Safeguarding Policy. While the SSoE has a responsibility to ensure training and education is provided in accordance

with the Policy, all staff have an individual responsibility for accessing and participating in such training. All staff should be provided with an electronic copy of the Safeguarding Policy and given the name and contact details of the SSoE's Safeguarding Officer. All partners, suppliers, contractors, and customers (including children, adults and parents who participate in projects and programmes) should be made aware of the existence of our Safeguarding Policy and provided with copies on request. This should include advice about who to contact if they have a concern, allegation or a complaint.

TYPES OF ABUSE

The general definition of child abuse adopted in Scottish Office guidance³ refers to circumstances where “a child or young person’s basic needs are not being met in a manner which is appropriate to his or her individual needs and stages of development and the child is, or will be, at risk through avoidable acts of commission or omission on the part of their parent(s), sibling(s) or other relative(s) or a carer (i.e. the person(s) while not a parent who has actual custody of, charge of, or control over a child).”

Physical abuse

Assault, rough handling, pushing, biting, scalding, spitting, punching, unauthorised restraint

Psychological and Emotional abuse

Intimidation; Coercion; harassment, threats, Cyber bullying, enforced isolation, intentionally leaving someone unattended when they need assistance; stopping a person from meeting their religious and cultural needs; preventing the expression of choice and opinion.

Sexual abuse

The threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual nonphysical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualised photographs etc.).

Neglect

The ongoing failure to meet a person’s basic physical, emotional, or psychological needs. For example, not providing food, shelter, or clothing, not responding to educational or medical needs of someone who is reliant on you.

³ Protecting Children – A Shared Responsibility – Guidance on inter-Agency Cooperation, Scottish Office 1998

Financial or material

Theft of money, scamming, fraud, preventing someone from accessing their own money, false representation, exploitation of a person's money or assets.

Organisational

Abusive and disrespectful attitudes toward people using the service, lack of respect for dignity and privacy.

Modern Slavery

Human trafficking, forced labour, debt bondage, sexual exploitation.

Discriminatory:

Unequal treatment based on difference – race, gender, civil partnerships, belief, sex or sexual orientation.

RECRUITMENT AND SELECTION OF STAFF AND VOLUNTEERS

Careful consideration needs to be given to the recruitment of staff and volunteers for SSoE.

- All applicants to our organisation will complete an application form.
- Short-listed applicants will be asked to attend an interview.
- Short-listed applicants will be asked to provide references and these will always be taken up prior to confirmation of an appointment.
- Creche workers and tutors teaching children and vulnerable adults will be asked to undergo a PVG check.

It is the policy of the SSoE that no-one shall work or volunteer to work with children and young people within or on behalf of the SSOE who:

- has been convicted of or has received a formal police caution concerning an offence against children as listed in the First Schedule of the Children and Young Person's Act 1933; or
- has been convicted of or has received a formal police caution concerning sexual offences against children and young people.

This means that:

It is our policy that anyone applying to do 'regulated work' with children or young people is suitable for this type of work. In order to do this, individuals will be asked to become a Protection of Vulnerable Groups (PVG) Scheme member and to make a self-declaration of any relevant

convictions or investigations. Recent changes in legislation mean that positions of regulated work are no longer exempt from the Rehabilitation of Offenders Act (Scotland). Under the new Rehabilitation of Offenders Act (Exclusions and Exceptions) (Scotland) Amendment Order 2015 applicants are now required to disclose any unspent convictions or cautions and any spent convictions for offences included in Schedule A1 'Offences which must always be disclosed'. However, applicants are not required to disclose spent convictions for offences included in schedule B1 'Offences which are to be disclosed subject to rules' until such time as they are included in a higher-level disclosure issued by Disclosure Scotland. Prospective employees or volunteers will receive a copy of their PVG certificate 10 days before the employer/charity. During this 10-day window the applicant can lodge an appeal to have any previous spent convictions removed from their PVG certificate before it reaches the employer. It is worth noting that the 10-day window is only to lodge their appeal and the appeal process is likely to take much longer. Details of offences which applicants can now appeal to have removed from their PVG certificate are available at:

<http://www.disclosurescotland.co.uk/about/documents/UKSCOffencesThatWillBeDisclosedSubjectToRulesv1website10September2015.pdf>

A non-disclosed new team member may be able to start volunteering with crèche or teaching young persons while their disclosure is being processed, provided that they have successfully completed a self-disclosure form (See Appendix I) and are not left alone with any vulnerable individuals. However, those responsible for the appointment reserve the right to not permit this concession if they have concerns regarding the suitability for involvement in the school of the individual whose disclosure is outstanding.

The SSoE's Safeguarding Policy will be discussed with the candidate, and they will be asked to sign a form stating that they have received and read this document.

For recruitment of ex-offenders see Appendix II.

[What do Protection Services do when I apply to be a PVG Scheme Member?](#)

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THE RECRUITMENT OF APPLICANTS FROM OUTWITH THE UK

In addition to the above, in certain circumstances, SSoE can ask prospective volunteers, employees or members of staff who were born or who have lived outwith the UK to provide a criminal record certificate, where available, from their government or an appropriate government/police agency in the country where they were born or resided. Guidance on the availability of this service is provided by the CRB in England and can be accessed at:

www.crb.homeoffice.gov.uk

STORING DISCLOSURE DATA

SSoE complies with the Code and the 1997 and 2007 Acts regarding the handling, holding, storage, destruction and retention of disclosure information provided by Disclosure Scotland. We also comply with General Data Protection Regulation (GDPR) came into force on May 25, 2021. For further information see Appendix III: Policy on the Secure Handling, Use, Storage, Retention and Destruction of Disclosure Information.

TRAINING AND SUPERVISION

The successful applicant will receive induction training, which will give an overview of the organisation to ensure they know its purpose, values, services and structure. Relevant training and support will be provided on an ongoing basis and will cover information about their role, and opportunities for practicing skills needed for work. Training on specific areas such as health and safety procedures, identifying and reporting abuse, and confidentiality will be given as a priority to new staff and volunteers and will be regularly reviewed. A record of when and who attended the training will be taken.

All staff and volunteers will have a designated supervisor who will provide support and regular feedback on their performance, skills, motivation and expectations.

Furthermore, the SSoE will:

- Plan the work of the organisation so as to minimise situations where the abuse of children may occur.
- Make paid and voluntary appointments conditional on the successful completion of a probationary period.
- Issue guidelines on how to deal with disclosure or discovery of abuse.
- Appoint a named individual from within the SSoE to act as a Safeguarding Officer. Their role will include the continual monitoring of the effectiveness of the organisation's Safeguarding Policy, plus the dissemination of information relating to Safeguarding to members of the SSoE and to paid staff and volunteers.

PHOTOGRAPHING

The majority of occasions when people take photographs or record videos are valid and do not provide any cause for concern. Unfortunately, there are occasions when this is not the case and these are some of the risks associated with photographing children or vulnerable adults:

- The collection and passing on of images which may be misused
- The identification of individual children to facilitate abuse
- The identification of children in vulnerable circumstances

It is therefore recommended that **explicit written consent is always obtained from adults and/or parents in the registration form when joining the school** in order to comply with legal

requirements laid out in GDPR. This states that one of the required conditions for processing sensitive data is that the data subject has given his explicit consent to the processing of personal data.

- **Reason and purpose**

Photographs should only be taken by an authorised person who has a suitable reason related to the child or SSoE i.e., they are a parent, a relative, and a designated member of staff. Unless photographs or videos are taken as part of SSoE activities such as; social events, competitions, excursions etc, they should be used for an individual purpose not a public purpose e.g., not posted on the internet and not passed on to others unconnected with the child. Parents must be aware of these policies and consent to them.

- **Appropriateness of images**

No images to be taken of children which capture them in what are commonly understood as non-public activities like toileting or changing clothes, or which show body parts not usually visible in public settings. Children should be fully clothed. Images involving groups should be about the activity, not the individual child.

- **Identification of subjects**

Any photograph or video should not allow an unauthorised person to identify a child or their whereabouts. So, if using a full name have no photograph, if using a photograph have no full name. Children in vulnerable circumstances, like being in care or victims of parental violence, should not be photographed or filmed at all unless there is clear consent and no risk.

- **Photography for public display**

SSoE can decide whether publicity photographs are permitted and if so you should inform the press of your policies before they arrive. It is worth noting that it is not illegal to take photographs at a public event even if asked not to do so, but if your event is private then you can insist that your own policy is followed. Photographs or video recordings of children in activities should try to include a wide range of types of children, and not show them in breach of rules, or behaving in a reckless or dangerous fashion. Images should never be stored in personal computers.

When the event starts, SSoE may allow parents to take photos on condition that they will not post them on any social media website. Only the authorised by SSoE person is allowed to take photographs (only of those children whose parents signed the consent form) and post them on social media or use them for marketing purposes.

PROCEDURES FOR RESPONDING TO CONCERNS

Everyone shares responsibility for safeguarding and promoting the welfare of children and adults and for supporting the implementation of this policy, irrespective of individual roles.

The Board of Directors and Managers are accountable for fostering a safe working environment that is free from any form of harassment, exploitation, abuse, or harm. They lead by example and uphold the highest ethical standards. Demonstrating respectful and inclusive behaviour sets the tone for the entire organisation.

Irrespective of role or function, all those working for or on behalf of SSoE, in any capacity, have a

responsibility to:

- Report all allegations or concerns about actual or suspected incidents of abuse involving child(ren) or adult(s) who is a beneficiary or service users of SSoE.
- Report all allegations or concerns about actual or suspected incidents of abuse involving a child(ren) or adult(s) even if they are not known to SSoE (for example a sibling of a child or adult attending SSoE).
- Report all allegations or concerns about actual or suspected staff misconduct or criminal activity involving the abuse of a child(ren) or adult(s).
- All allegations or concerns must be treated with confidentiality and shared on a need-to-know basis.

It is **not the responsibility of staff to decide whether abuse has taken place. All staff, however, have a mandatory duty to report any concerns** – even where these are vague and are only a suspicion or ‘intuition’ that something is not right. No staff member can agree to keep information regarding actual or suspected abuse ‘private’ as a personal confidence. SSOE is not an investigative authority, and therefore where appropriate referrals will be made to relevant social welfare/statutory and law enforcement agencies. The Stirling School of English will seek agreement to making a referral from the child and their parents/guardians or the adult unless this places them at increased danger/risk of harm.

SSoE has a general responsibility to act if abuse comes to light and, as far as possible, to protect children or vulnerable adults from the possibility of being abused. It is important to listen carefully to what the child/adult says without prompting or using leading questions.

Through volunteer and staff training everyone must be aware of the Safeguarding Policy of SSoE and be aware on confidentiality and the limit of the sharing of information on a need-to-know basis.

What to do once a child has talked to you about abuse

- 1 If any young person discloses information about a past or present abuse situation, the crèche worker or tutor must make a handwritten narrative of the conversation as soon as possible after they have spoken with that child (preferably immediately or at least within an hour of the interview). Write down **exactly** what the child or young person said, when he/she said it and what was happening immediately before the interview.
- 2 You should also make an accurate record of anything that you may have said to the child during the discussion, and any response received.
- 3 Record dates and times of these events and when you wrote the report.

- 4 Keep all handwritten notes, even if these have subsequently been typed up.
- 5 You should not discuss your suspicions or the allegations with anyone other than those set out in the procedures below.

Where physical/emotional abuse or neglect is suspected:

If you suspect that a child may be the victim of such abuse the following procedure must be followed:

- 1 A crèche worker or other volunteer recognising or being suspicious of abuse has a duty to record the facts (not opinions) objectively and ensure the victim's safety so far as this is within their power.
- 2 Inform the Safeguarding Officer for SSoE: **Ilona Hunter** on **07742514087** and she will act accordingly based on the information she has received. Incidents/suspensions of child abuse will be reported to the Social Services Department by the Safeguarding Officer.
- 3 The Safeguarding Officer should contact Social Services in case of deliberate injury or if concerned about a young person's safety or if a young person is afraid to return home. **Do not tell the parents.** Stirling Council Social Work department can be contacted on 01786 471177 or out of hours on 0845 277 7000 and ask to get put through to the Emergency Duty Team (EDT).
- 4 The Safeguarding Officer should seek medical help if needed urgently, informing the doctor of any suspicions. The decision to refer the victim to his/her GP or A&E department of the nearest hospital for a medical examination will depend on the seriousness of any injury and the need for evidence to pursue a full investigation.
- 5 In the case of lesser concerns (e.g., poor parenting) the Safeguarding Officer should encourage parents carer to seek help (but not if this places young person at risk of further injury).
- 6 All concerns or allegations will be referred to the appropriate agencies i.e., Police/social worker.
- 7 When a volunteer or member of staff is permanently removed from a regulated work position, there are certain circumstances where an organisation must notify the Protection Unit at Disclosure Scotland that this has happened. This is called "Making a Referral". Please see Appendix V for the 'Referrals Policy'.

If there are allegations of sexual abuse:

1. Contact Social Services or the Police directly for advice. Do not speak to the parent (or anyone else) if there is a possibility that they could be involved. The fact that you may feel the young person's story is unlikely must not prevent appropriate action being taken. For example, a child may say that he/she has been abused by an older young person. In reality, the perpetrator could be a parent or close relative, but naming another person may be the only way in which this child can seek help
2. It is the responsibility of a crèche worker or tutor to pass on concerns regarding the possibility of abuse to the Safeguarding Officer and then the Social Services Department, albeit that the Safeguarding Officer will normally make contact with the Social Services Department.
3. The role of SSoE is essentially collecting and clarifying the precise details of the allegation and providing the information to the Social Services Department, whose task it is to investigate under Section 47 of the Children Act 1989. It is not the job of a crèche worker or tutor to seek evidence.
4. A crèche worker or tutor should normally consult with the Safeguarding Officer before reporting incidents/suspicions of child abuse to the Social Services Department. The absence or unavailability of the Safeguarding Officer should **not** however delay referral to the Social Services Department. Exceptionally, should there be any disagreement between a crèche worker or tutor and the Safeguarding Officer as to the appropriateness of such a referral, a crèche worker or tutor nevertheless retains a responsibility as a member of the public to report serious matters to the Social Services Department.

Action after referral

1. The crèche worker or tutor should make a careful written note of what has been observed and action taken, and this should be dated and signed. Confirm the referral in writing to the Social Services Department within 48 hours.
2. At an early stage the crèche worker or tutor will need to clarify with the family and the Social Services Department what his/her role will be during the course of the Social Services investigation.
3. It may be helpful to provide a written report on the background to the suspicion/allegation and on the family background in preparation for attendance at the initial child protection conference (normally within 15 days).
4. The crèche worker or tutor may be invited to attend the meeting of the initial child protection conference, either to contribute to the meeting or as a support to the parent. It is important to clarify the expectations in advance.

Action after initial child protection conference

1. If sent a copy of the minutes, the accuracy should be checked and the Chair of the Conference informed immediately if any errors or amendments are required. The record is otherwise assumed to be agreed. Minutes must, if retained, be kept securely and confidentiality preserved. Minutes must not be passed on to anyone else or copied.
2. If dissatisfied with the outcome of the conference, the crèche worker or tutor should consult with the Chair of the meeting.

Accusations of abuse against Volunteers and Staff of SSoE

- 1 If any members of staff or volunteers are accused of abuse SSoE will co-operate with other agencies in the enquiry and the staff member or volunteer will be suspended immediately.
- 2 If an accusation of abuse is disclosed to a volunteer about another volunteer, then the Safeguarding Officer must be informed.
- 3 If an accusation of abuse is disclosed to a volunteer regarding the crèche worker or another volunteer, the volunteer must report this directly to the Safeguarding Officer and not involve the crèche worker or another volunteer. The Safeguarding Officer will then deal with the accusation appropriately involving appropriate organisations.
- 4 If an accusation of abuse is disclosed to a volunteer regarding Safeguarding Officer, the volunteer must report this directly to the Chairman of the Board of Management of the charity-
David Howes: davidinchatel@yahoo.co.uk
- 5 All concerns will be taken seriously and appropriate agencies will be contacted and involved. Where grounds for referral are met, the crèche worker or any other volunteer or staff member involved will be referred to the Child Offenders list.

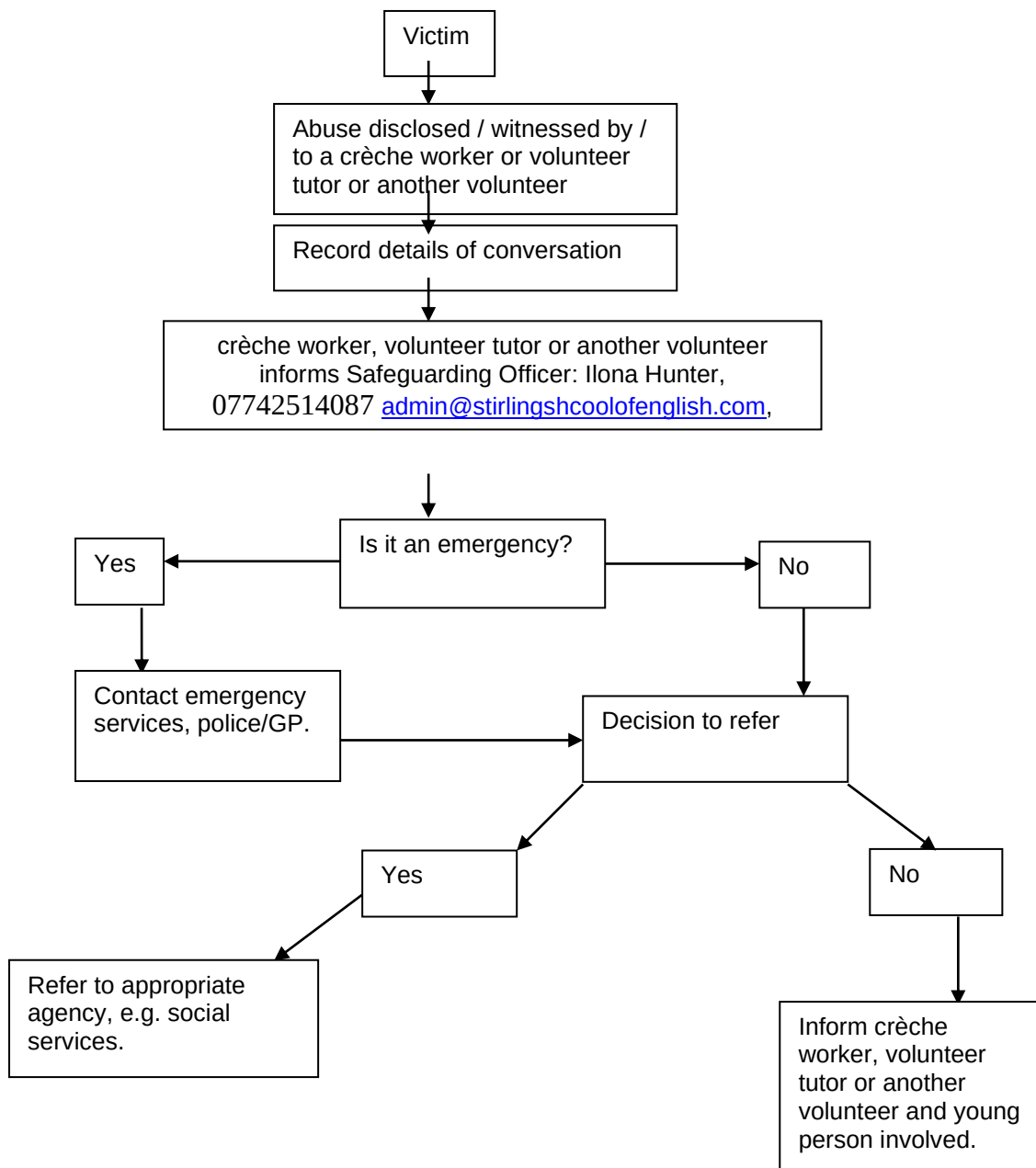
Protection of workers who report care and protection concerns

The law protects anyone from actions by those individuals who have been implicated in the abuse, harm or neglect of a child or young person AS LONG AS the worker's report was not malicious or vexatious.

The SSoE will provide support to those volunteers and/or staff involved in an abuse case. This support may come from outside partner organisations.

SUMMARY OF REFERRALS PROCESS- CHILDREN

Disclosure or suspicion of abuse.



- Record details of all conversations with young person including dates, times and everything said and witnessed, also any action taken. Keep a record of this.
- Crèche workers/volunteers must never attempt to investigate any child protection concern.
- Crèche workers/volunteers should not speak to/contact parents.

SUMMARY OF REFERRAL PROCESS-ADULTS

An individual has a concern about an adult being at risk from harm or abuse or receives a disclosure of harm from an adult, regarding themselves or another adult.

volunteer

- Listen to disclosant OR observe something that concerns them
- Pass on concern to development worker/manager IMMEDIATELY
- With support from a manager or development worker, report to appropriate agency, if required (normally this will be done by the adult with support from staff.)
- Maintain confidentiality
- Record concern on a Adult Concern form (appendix 3)
- Contact manager immediately

Manager or staff

- Report concern to Stirling Adult protection 01786 404040(01786 470500 nighttime and weekends) or relevant organisation, involving subject of concern, where possible.
- Ensure the concern has been properly recorded
- Liaise with external services, as required
- Record ongoing information about the case (appendix 4)
- Support staff member, volunteer, learner concerned, as required.
- Report to Board of Directors (maintaining confidentiality)

In an immediate emergency, call the police on 999.

Managers will contact:

- Stirling Adult protection 01786 404040(01786 470500
- Police Scotland non-emergency 101
- Modern Slavery Helpline 08000 121 700
- Hemat Gryffe Women's Aid 0141 353 0859

DATA PROTECTION AND MANAGEMENT OF CONFIDENTIAL INFORMATION

- 1 Every effort should be made to ensure that confidentiality is maintained for all concerned.
- 2 Information should be handled and disseminated on a “need-to-know” basis only.
- 3 Information should be stored in a secure place with access limited to designated people; in line with data protection legislation (e.g., that information is accurate, regularly updated, relevant and secure).
- 4 SSoE regard the lawful and correct treatment of personal information as very important to successful operations, and to maintaining confidence between those with whom we deal and ourselves. We ensure that our organisation treats personal information lawfully and correctly.

REVIEW OF SAFEGUARDING POLICY AND PROCEDURES

- 1 This policy and procedures will be regularly monitored and reviewed:
 - in accordance with changes in legislation and guidance on the protection of children and young people.
 - Following any issues or concerns raised about the protection of children and/or young people.
 - In all other circumstances, every second year.
- 2 Responsibility for this review will lie with the Board of Management in consultation with the Volunteer Manager.
- 3 Date of approval of adult and child protection policies: **June 2022**

Date of amalgamation of the child and adult protection policy into Safeguarding Policy: **August 2024**

Date of next review: August 2026



David Howes
(chairman)

APPENDIX I

How to react when a child wants to talk about abuse

The most important thing to remember is that when a child discloses that abuse of any nature is taking place (or has taken place), they are divulging a secret. It is not the place for this document to provide guidance for counselling in this scenario, but please make sure that the child knows that you believe them. Many situations have arisen where the first person to be told of such events failed to demonstrate that they believed the child in the first instance and this led to the abuse being covered up for years.

If a child wants to talk to you about some form of abuse use the following guidelines as much as possible and as appropriate to the situation.

General points are;

- Accept what the person says
- Keep calm
- Be honest
- Look directly at the young person
- Do not appear shocked
- Let them know that you may need to tell someone else – do not promise confidentiality
- Assure them that they are not to blame for the abuse
- Never ask leading questions
- Never push for information
- Do not fill in words; finish their sentences or make assumptions
- Be aware that the young person may have been threatened

Helpful things to say:

- “I believe you” (or showing acceptance of what the person says)
- “I am glad you told me”
- “It’s not your fault”
- “I will help you”

Avoid saying:

- “Why didn’t you tell anyone before?”
- I can’t believe it”
- “Are you sure this is true?”
- Avoid questioning the child: Do not begin with WHY? WHEN? WHO? WHERE?
- Use: Tell me-Explain- Describe
- Never make statements such as: “I’m shocked – don’t tell anyone else”

APPENDIX II GOOD PRACTICE: ADULT PROTECTION

- disclosures of harm or abuse: do not attempt to investigate-investigation of abuse is the responsibility of the police and/or social work departments. Don't promise confidentiality.

– any concerns must be passed on immediately to your manager (who is the Safeguarding Officer). Be clear that we cannot maintain confidentiality if the adult is at risk to themselves or to others. Maintain confidentiality within guidelines.

- do not discuss the situation with other volunteers or staff members, unless they are directly involved in disclosure. Any discussion should be only held for establishing facts and any action to be taken. Use the support of development workers and managers. Listen and only ask open questions.

– listen carefully and be fully attentive to the adult during their disclosure or allegation of abuse. Avoid asking leading questions and keep your questions to a minimum. Open questions ensure that we do not guide what the adult is disclosing. Do not make value judgements.

– no matter what the issue is the adult disclosing harm or abuse may have loyalties to the person that may be causing this. Avoid showing any personal judgements on this and stick to facts. Reassure.

– it may have taken a lot of courage to talk to someone. Let the adult know they have done the right thing and that you will help them to get the support they need. Describe the next step.

- unless an adult is in immediate danger, you need to get full consent from the adult to pass any concerns on to other organisations. Let them know that you want to support them and that you need to talk to the development worker and/or manager, who will help them decide what they want to do next. Speak to the person in the organisation who has responsibility for adult protection.

– remember that this is the person who has the responsibility for ensuring that disclosure or concerns about abuse are effectively handled. Write down what you have been told.

– try to write exactly what the adult said to you and the phrases he or she used. This should be written on an adult protection concern form and passed on to a development worker/manager and stored confidentially. Ask for support for yourself.

– handling a disclosure of abuse can leave you feeling overwhelmed and vulnerable. Speak to your line manager or development worker.

APPENDIX III ADULT PROTECTION CONCERN FORM

Initial report form for disclosure/concern of abuse

Name of person noting concern:	Date (reference):
Please circle: Volunteer Staff Member Manager Other	
Name of adult (if known):	
Date of birth (if known):	
Address and telephone number (if known):	STAFF ONLY
Name of other adults (if known) and children (include ages if known):	
Any special circumstances relating to the adult (e.g. special needs, health and welfare issues):	
What is the nature of the concern? (Please circle) Disclosure Incident Signs or Indicators Other	
If an adult has disclosed abuse, Date: Name(s): Time:	
Details of the concern. (If an adult has disclosed abuse, record as quickly as possible what the adult said. Remember that this should be as accurate as possible)	
Who else was present at the time of disclosure/incident/initial concern?	

If known, record the name(s) of the person or persons implicated in the abuse.	
Date and time discussed with development worker (if relevant) Date: _____ Name(s): _____ Time: _____	
Date and time discussed with manager Date: _____ Name(s): _____ Time: _____	
Date and time referral to social work or police Date: _____ Name (of caller): _____ Time: _____ Name (of SS or police): _____	
Date and time referral to other organisations Date: _____ Name (of caller): _____ Time: _____ Name of Organistaion: _____ Name of worker: _____ Contact Details: _____	
Advice given from social services or police	
Advice given from referral organisations	

Concerned Person Signed	Name (print):
Date	
Development Worker Signed	Name (print):
Date	
Manager Signed	Name (print):
Date	

This form must be kept in a confidential file. Information given in this form must only be disclosed to relevant persons on a need to know basis.

☐ Additional paper attached (number of pages)

APPENDIX IV – ADULT PROTECTION Follow up recording

To be filled in by managers, or staff member appointed by manager ONLY

Case number (initial concern date): _____

Date	Brief facts e.g. appointment made, referrals	Staff Present	Manager Signature

APPENDIX V Referrals Policy of Stirling School of English SCIO

This policy is relevant to all those involved in making recruitment/disciplinary decisions in our organisation.

When a volunteer or member of staff is permanently removed from a regulated work position, there are certain circumstances where our organisation must notify the Protection Unit at Disclosure Scotland that this has happened. This is called "Making a Referral". If we would have permanently removed the individual, the actions detailed in this policy will continue to apply (even if a member of staff or volunteer leaves their regulated work position prior to any action being taken, irrespective of the reason that they leave).

2 conditions must be met before we let Disclosure Scotland know that something has happened.

Condition 1 – A person has been permanently removed/removed themselves from regulated work

Condition 2 – At least 1 of the following 5 grounds apply

- Caused harm to a child or protected adult
- Placed someone at risk of harm
- Engaged in inappropriate conduct involving pornography
- Engaged in inappropriate sexual conduct
- Given inappropriate medical treatment

When both of these conditions have been met, it is a legal requirement that we must let Disclosure Scotland know by making a referral within 3 months of the permanent removal of the individual.

Where there is an historical allegation of harm or inappropriate behaviour about someone who is no longer in regulated work with us but which we believe would, in all probability, have led to the 2 conditions being met, we will consider whether we want to make a referral but the legal responsibility applies only after 28 February 2011 when PVG was first introduced.

Where it is necessary to make a referral, this process will be carried out by the Volunteer Manager. In their absence, the referral process will be carried out by the Chairman of the Board of Management. Those who are in a position which may involve carrying out disciplinary action which may result in the removal from regulated work or dismissal of someone in regulated work must ensure they notify the Volunteer Manager or, in their absence, the Chairman of the Board of Management, of the legal requirement to make a referral where the conditions above have been met.

Failure to make a referral where required, may result in our organisation being prosecuted. It is therefore essential that those involved in carrying out disciplinary action notify the Volunteer Manager or the Chairman of the Board of Management when both conditions for making a referral have been met.

How to refer an individual to Disclosure Scotland

A referral form is available on the Disclosure Scotland website, which asks for the information on the individual's identity, type of "regulated work" involved in for (insert organisation name), PVG Scheme number, information on the harmful behaviour and details (with documentation) relevant to the investigation carried out by (insert your organisation name) – and the outcome.

The referral should not identify any children or protected adults by name (for example, victims and witnesses) and should use a coded reference (e.g. child A, age 12).

The completed referral form and documentation can be submitted via e-mail to pucorrespondence@disclosurescotland.gsi.gov.uk or can be printed out and posted to the address provided in the form.

APPENDIX VI POLICY ON THE RECRUITMENT OF EX-OFFENDERS

Policy Statement

1. The Code of Practice (“the Code”) is published by Scottish Ministers under section 122 of Part V of The Police Act 1997 (“the 1997 Act”). The Code identifies obligations which registered bodies, counter signatories and other recipients of disclosure information issued under the 1997 Act and the Protection of Vulnerable Groups (Scotland) Act 2007 (“the 2007 Act”).
2. We comply with the Code, the 1997 and 2007 Acts regarding the treatment of individuals who are subject to Disclosure Scotland checks. We undertake not to discriminate unfairly against the subject of a disclosure on the basis of conviction or other information revealed.
3. We will provide a copy of this policy and the Code to any student or volunteer who asks to see it. The code can be found via this link: <https://www.mygov.scot/disclosure-code-of-practice/disclosure-scotland-code-of-practice.pdf?inline=true>
4. We are committed to equality of opportunity, to following practices, and to providing a service which is free from unfair and unlawful discrimination. We ensure that no applicant or member of staff is subject to less favourable treatment on the grounds of offending background. We actively promote the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. The selection of candidates for interview will be based on skills, qualifications and experience.
5. We will use a Disclosure Scotland check only where this is considered proportionate and relevant to the particular position or type of regulated work. This will be based on a thorough risk assessment of the position or work and having considered the relevant legislation which determines whether or not a Standard or Enhanced Disclosure under the 1997 Act or a Scheme Record under the 2007 Act is applicable.
6. Where a disclosure application or request is deemed necessary, individuals will be made aware that the position or work will be subject to a Disclosure Scotland check and that the nature of the position or work entitles us to ask about spent and unspent convictions.
7. We will ask individuals to complete a criminal record self-disclosure form. We will stress to individuals that they should be honest in their response. We will ask that this form be returned under separate, confidential cover, to a designated person within our organisation and we guarantee that this form will only be seen by those who need to see it as part of the decision-making process.
8. At interview, or under separate discussion, we undertake to ensure an open and measured discussion on the subject of any offences or other matters that might be considered relevant for the position or work concerned.

9. We undertake to discuss any matter revealed in a certificate¹ issued under the 1997 Act or a Scheme Record issued under the 2007 Act with the subject of that disclosure before a decision is made.

10. We ensure that all those who are involved in the decision-making process have been suitably trained to identify and assess the relevance and circumstances of disclosure information. We also ensure that they have received appropriate guidance and training about providing work for ex-offenders.

HAVING A CRIMINAL RECORD WILL NOT NECESSARILY DEBAR YOU FROM WORKING WITH US.

APPENDIX VII RECRUITING PEOPLE WITH CONVICTIONS

[CONTENTS \(CLICK ON HEADINGS TO JUMP TO THAT SECTION\)](#)

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[OFFENCES WHICH MUST BE DISCLOSED SUBJECT TO EXCEPTIONS \(APPENDIX 3\)](#)

[COMMON LAW OFFENCES](#)

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[TABLE A - DISCLOSURE PERIODS: ORDINARY CASES \(APPENDIX 5\)](#)

[TABLE B -DISCLOSURE PERIODS: SERVICE DISCIPLINARY SENTENCES \(APPENDIX 5\)](#)

Recruiting People with Convictions Policy

The purpose of this policy is to provide assurance to applicants, staff and volunteers and guidance to those making recruitment decisions of our organisations process in assessing whether any conviction information provided to us, either through self-disclosure or in a disclosure certificate impacts on a person's ability to carry out the role that they have applied for or which they hold within our organisation. It is important to recognise that having a criminal record does not necessarily mean that someone cannot work or volunteer for our organisation.

Our organisation treat all applicants fairly and consistently in accordance with the requirements of Rehabilitation of Offenders Act 1974 (as amended). We do not differentiate between paid and unpaid roles when applying the criteria detailed in this policy, the assessment is based entirely on the requirements of the role and any information shared with us either through self-disclosure or contained in a disclosure certificate. The level of disclosure which we will access will be the appropriate level for the role (basic, standard, enhanced or PVG).

Self-Disclosure

We operate a fair recruitment process and will ensure anyone applying for, or holding a role in our organisation is given the opportunity to discuss any unspent convictions which they are required to tell us about.

As part of our recruitment process, the self-disclosure form should be completed and returned with application form. The form should be returned in a separate sealed envelope and will only be opened if the candidate is provisionally offered the role subject to the outcome of the disclosure. Any self-disclosure forms for unsuccessful candidates will be securely destroyed without being opened.

The rules around what you need to disclose are complex and it may be difficult to know what should and should not be disclosed. We should, therefore, only be told about unspent convictions, using the form in Appendix 1. You should not tell us about any convictions which were gained before the age of 12, those which are spent and any which are not considered appropriate to disclose subject to exceptions. There is a guidance document in Appendix 2 which will give you detailed information on how long a conviction is considered unspent and a table of disclosure periods in Appendix 5. If you are in doubt, you can seek legal advice (at your own expense) or you can withhold the conviction information until the appropriate level of disclosure is received.

Appendices 3 and 4 list offences that are made available for a longer period of time for roles which require a standard, enhanced or PVG disclosure. The offences in Appendix 3 are made available on the disclosure certificate for an extended timeframe (a minimum of 15 years for those aged 18 or over at the date of conviction and 7½ years for those under 18 at the date of conviction) with the opportunity to appeal for removal after the extended timeframe has passed.

The offences in Appendix 4 are made available on the disclosure certificate for at least the time that they are unspent and then an extended timeframe (up to a maximum of 15 years for those aged 18 or over at the date of conviction and 7½ years for those under 18 at the date of conviction) with the opportunity to appeal for removal once in the extended timeframe from becoming spent under normal circumstances until the extended timeframe has passed. After this time the offence will no longer be disclosed.

Once in post, any member of staff or volunteer who gains any new convictions, must complete the self-disclosure form in Appendix 1 and return it to the volunteer manager. It is

important to note that failing to follow this ongoing self-disclosure process may result in disciplinary action and could ultimately result in dismissal.

Disclosure Certificate

In order to ensure there is no bias in our recruitment decisions, accessing the disclosure certificate will be the final part of our recruitment process and will only be requested when we have provisionally offered the role, subject to a satisfactory disclosure.

When we receive our copy of your disclosure certificate, we will compare it to the self-disclosure form which you have completed. If there are any differences between the details on the two documents, we will arrange to discuss this with you. We will not make any judgement on the reasons that information differs prior to our discussion as we understand that the rules around what information you should share with us is complex.

How We Will Use Disclosed Information

Any information disclosed will be treated in the strictest confidence and only people required to see the information to help assess it will have access to it. There may be instances where we need to seek support or guidance externally (for example, from a solicitor). When this is necessary, we will not share any information which will identify you, only the information which we require support or guidance on.

Where information has been detailed on the self-disclosure form but is not shared on the disclosure certificate, we must always disregard this information as this means that you have provided information that you were not required to share.

We do, however, need to risk assess any conviction or vetting information carefully to ensure there is no risk to our organisation or those who use our services. In order to ensure we carry out a fair and consistent practice when we assess any conviction or vetting information, we will take into account the following criteria:

- Is the conviction relevant to the position being offered?
- How serious was the offence?
- How long is it since the offence took place?
- Is there a pattern of offending behaviour?
- Have the personal circumstances changed since the time of the offending behaviour?
- How has the person become rehabilitated?
- Is the person barred from the type of regulated work we need them to do?

If we determine that the disclosed information is relevant to the role, we will withdraw the job or volunteering role offer. For those already in post, this may result in disciplinary action and could ultimately result in dismissal. The reason(s) for our decision will be fully explained.

Appeals

If you feel that the risk assessment has not been carried out appropriately or that our decision is unfair, you have the right to appeal. Appeals should be made in writing to the chairman of the board who will hear the appeal with the secretary and volunteer manager and reply in writing within 14 days.

APPENDIX VIII

POLICY ON THE SECURE HANDLING, USE, STORAGE, RETENTION AND DESTRUCTION OF DISCLOSURE INFORMATION

The purpose of this policy is to provide guidance and instruction on how to appropriately handle disclosures for those who will have access to them and to provide assurance to Volunteer Scotland Disclosure Services and our staff and volunteers that their disclosure information will be handled, used, stored and destroyed appropriately and in accordance with the Disclosure Scotland Code of Practice.

For the purpose of this policy, PVG Scheme Records, PVG Short Scheme Records, Standard disclosures and Enhanced disclosures will be referred to as disclosures.

This policy is for organisations enrolled with Volunteer Scotland Disclosure Services to access disclosures for the purpose of assessing individual's suitability for paid and/or voluntary work.

In accordance with the Scottish Government Code of Practice, for registered persons and other recipients of disclosure information, we will ensure the following practice.

Requesting Disclosures

Disclosures will only be requested when necessary and relevant to a particular post and the information provided on a disclosure will only be used for recruitment purposes.

Our organisation will ensure that an individual's consent is given before seeking a disclosure. Before using disclosure information for any other purpose, we will seek their consent and will take advice from VSDS to ensure it is appropriate to use the disclosure for a purpose other than recruitment. Furthermore, we will ensure that all sensitive personal information that is collated for the purposes of obtaining a disclosure will be always managed confidentially by those involved in the disclosure process.

We will not request disclosure information for other organisations without first discussing the appropriate process and receiving approval for this from VSDS.

Sharing Information

We will only share disclosure information with those authorised to see it in the course of their duties.

Storage

Disclosure information will be stored in secure conditions as follows:

- **Online Results:** A note will be taken of any vetting information which needs to be reviewed. Access to disclosure information will be restricted to those that are entitled to see it in the course of their duties. When receiving an online result, it is essential that we record the information required for our Disclosure Tracking Record. No photocopy or other image of the disclosure information will be retained.
- **Paper Disclosures:** Paper documents will be kept in lockable and non-portable storage units. Access to disclosure information will be restricted to those that are entitled to see it in the course of their duties. No photocopy or other image of the disclosure information will be retained.
- **Telephone Results:** When receiving disclosure information by telephone, VSDS staff will only convey information detailed in disclosures accessed by our organisation to our enrolled signatories once they have correctly answered the relevant security questions.

Failing to provide the correct answers to the required security questions will result in VSDS withholding the required information and may lead to an investigation being carried out to establish why our enrolled signatory was unable to provide the required security information. Once the disclosure information has been shared with us, VSDS will shred the disclosure.

VSDS does not keep a record of any information contained on the disclosure. When receiving a telephone result, it is essential that we record the information required for our Disclosure Tracking Record.

- **Emailed Certificates:** VSDS ceased emailing disclosures on 10 June 2024, this section is only required for organisations that received disclosures by email and stored those email disclosures. Care will be taken in relation to emailed disclosure information and we will endeavour to prevent unauthorised viewing, transmission, storage, printing or fraudulent manipulation. Access to email disclosures will be restricted to those who are entitled to see it in the course of their duties.

We will record electronically the date of issue, the individual's name, the disclosure type and the purpose for which it was requested, the unique reference number of the disclosure and details of our decision. This electronic file will be password protected and deleted when the individual finishes their appointment with the school.

No photocopy or other image of the disclosure information will be retained.

Record Keeping

It is our organisations responsibility to keep accurate information about disclosures we have accessed. The following information will be recorded on our Disclosure Tracking Record:

- Name of Applicant
- Date of Birth
- Level of Disclosure
- Position applied for
- Signatory
- Date Posted/requested online
- Date Processed (application requests only)
- T Reference Number
- Date disclosure issued
- Certificate/Disclosure Number
- PVG Membership Number
- Date Destroyed/Deleted
- Recruitment Decision and date

We will not record whether there was any vetting information as the Code of Practice prohibits this. VSIDS provides a sample tracking document in the guidance and resources section of their website.

Retention

We will not retain disclosures for longer than is necessary for the purpose for which the disclosure record was obtained. PVG disclosures will be destroyed securely on receipt of an updated PVG disclosure, and they will not be retained beyond the last day that a scheme member is carrying out regulated work for our organisation.

Destruction/Deletion

We will take reasonable steps to ensure that disclosure information is destroyed by suitable and secure means, for example, shredding, pulping or burning. Electronic images from email certificates will also be deleted permanently from both the email address where it was received and from where it is stored.

We will ensure that all staff with access to disclosure information are aware of this policy and have received training and support to help them to comply with both this policy and

the code of practice. A copy of this policy will be made available to any applicant, member of staff or volunteer who requests it.

Lost Disclosures

If we lose a physical or emailed copy of a disclosure or any other record of disclosure information, we will notify the scheme member(s) affected, VSDS and the Information Commissioners Office.

Code of Practice

Further instructions and guidance on secure handling of disclosure information can be found in sections 17 to 23 of the Code of Practice and 71 to 100 of the Annex to the Code of Practice.