



Safeguarding & Protection Policy for Children, Young People and Young Adults

Policy No.

SG

1

Author	SR	
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This policy is managed by our Deputy Safeguarding Lead and is given full sign off and endorsement by the Co-Chief Executive Officers. This policy is reviewed annually by SLT.

CONTENTS

1.0 Purpose of Policy

2.0 Legal Framework

3.0 About Career Ready

4.0 About this policy

4.1 Aims of the policy

5.0 Definitions

5.1 Safeguarding

5.1.1 Physical abuse

5.1.2 Sexual abuse

5.1.3 Emotional abuse

5.1.4 Neglect

5.2 Mental Health

6.0 Good Practice Guidelines

6.1 Mentoring Best Practices

6.2 What good practice means

6.3 Incidents that must be reported

7.0 Career Ready Events

7.1 When a school/college representative attends event

7.2 When students attend event independently

7.3 Staff ratios and supervision

8.0 Communications

8.1 Electronic Communications

8.2 Online Safety and Digital Safeguarding

8.3 Photography and Videos

9.0 Recruitment

10.0 Systems and Procedures

10.1 Procedure for responding to safeguarding and child protections concerns

10.2 Specific Roles

10.2.1 Internship volunteers

10.2.2 Mentors

10.2.3 Peer-to-peer

10.3 Confidentiality

10.4 Disciplinary Action and Suspension

10.5 Record-keeping

- 10.6 Timing
- 10.7 Conclusion of Investigation

11.0 Contacts

- 11.1 Designated Safeguarding Officer (DSO) + Senior Lead for Safeguarding
- 11.2 Deputy Designated Safeguarding Officers for England
- 11.3 Deputy Designated Safeguarding Officer for Scotland
- 11.4 PVG Officer for Scotland
- 11.5 DBS Officer for England

12.0 Further Information

13.0 Appendices

- 13.1 Appendix 1: Internal Career Ready Processing Process

This policy applies to all staff, including senior managers and the board of trustees, volunteers, mentors and sessional workers, agency or contracted staff, students and anyone working on behalf of Career Ready.

1.0 The purpose of this policy:

- To protect children, young people and young adults who receive Career Ready services and interventions.
- To provide staff and volunteers with the overarching principles that guide our approach to safeguarding and the protection of children, young people and young adults.

Career Ready believes that no person should ever experience abuse of any kind. We have a responsibility to promote the welfare of all children, young people and young adults and to keep them safe. We are committed to practise and work in a way that protects them.

2.0 Legal Framework:

This policy has been drawn up based on law and guidance that seeks to protect children, young people and young adults namely;

- Children Act 1989
- Children Act 2004
- Equality Act 2010
- GDPR and Data Protection Act 2018
- Human Rights Act 1998
- Safeguarding Vulnerable Groups Act 2006
- Sexual Offences Act 2003
- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education (KCSIE) 2025
- Safeguarding and Protecting People for Charities and Trustees 2021

- Keeping children safe in out-of-school settings Code of Practice 2021
- United Convention of the Rights of the Child 1991
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Care Act 2014
- Counter Terrorism and Security Act 2015: Prevent Duty
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government 2015
- Department of Culture, Media and Sport: Guidance on handling Safeguarding Allegations in a Charity 2024
- Online Safety Act 2023

3.0 About Career Ready

Career Ready is a national charity that connects young people to the world of work through a range of interventions which are delivered under a programme framework. The interventions include:

- Mentoring
- Workplace visits
- Internships
- Masterclasses

The first three interventions take place on both a group and individual basis. Masterclasses are only delivered to groups. All interventions may happen outside the classroom, most commonly at an employer premises.

Students who participate in the Career Ready programme are aged 15 -18. They may be enrolled at school, FE College or Sixth Form College. In England, a few of our students every year are aged 18 and over and that is why this policy also includes a reference to safeguarding young adults. For the benefit of this policy, all young people aged 15-18 will be referred to hereon as 'Career Ready students/young people', including the 18-year-olds that we support. Young people are based in England and Scotland.

4.0 About this policy and related procedures

Due to the nature of Career Ready's work and our interaction with young people it is important that we have a safeguarding and child protection policy specific to the type of work we do, to ensure the best possible protection of young people. The main areas that the policy addresses are mentoring, internships, workshops and employer visits. These give an idea of the type of interaction between the young person and the adult and an idea of how best to prevent problems occurring. We are aware of the important role we play in ensuring the safety of the young people who participate in the programme. This policy outlines the systems and procedures that are necessary to protect and promote their welfare.

This policy applies to adults working in any capacity with Career Ready, including Career Ready employees, volunteers, mentors, and workplace supervisors for internships. However, some parts of the policy apply expressly to particular groups. All adults working with Career Ready will be informed about this policy and where a copy can be obtained.

4.1 This policy aims to:

- Provide definitions of important and relevant terms
- Provide a contact list for relevant sources of information
- Outline good practice guidelines
- Supply details of the designated Career Ready staff who deal with safeguarding and child protection
- Ensure the commitment to safe recruitment
- Increase awareness of the possible risks of child abuse and neglect among adults working for and with Career Ready
- Ensure all adults who work with the Career Ready have a good understanding of safeguarding and child protection, ways in which to minimise risks, and the action that should be taken on becoming aware of any incidents.
- Ensure that all adults who work with Career Ready are aware of the structured response procedure for safeguarding and child protection cases
- Establish and provide the best system for child protection and promoting the welfare of students involved with Career Ready
- Express the commitment of Career Ready to safeguarding and child protection

5.0 Definitions in this policy and related procedures

Understanding different types of abuse is crucial as it dictates the way in which the situation needs to be dealt with. Each case is unique and therefore sensitivity to each case and its details are necessary to ensure the young person is protected in the best way possible. We are aware that some of the forms of abuse below may not be applicable to the work Career Ready carries out, but it is still important to have a good understanding of all of them.

Again, for the avoidance of doubt, "Career Ready student/young person" means any young person participating in the Career Ready programme, in whatever capacity and for any period. "Child/Children" and "Young People/Person(s)" are used interchangeably to mean any person under the age of 18. We also consider young adults over the age of 18 to be covered by this policy and procedure as noted above, as they may fall into the vulnerable category and will refer to them as "Young People/Person(s)".

5.1 Safeguarding: This document defines safeguarding as:

- Providing help and support to meet the needs of children/young people as soon as problems emerge
- protecting children/young people from maltreatment

- preventing impairment of children's/young people's mental and physical health or development
- ensuring that children/young people are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children/young people to have the best outcomes.

The types of abuse that may occur include:

5.1.1 Physical abuse: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child/young person. Physical harm may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury.

5.1.2 Sexual abuse: Sexual abuse involves forcing or enticing a child or young person to watch or take part in sexual activities, not necessarily involving a high level of violence, or whether the child/young person is aware of what is happening. The abuse does not need to involve physical contact.

5.1.3 Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on the child's/young person's emotional development. It may involve conveying to children/young people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child/young person opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It will include bullying (and cyber-bullying), causing children/young people frequently to feel frightened or in danger, or the exploitation or corruption of children/young people.

5.1.4 Neglect: Neglect is the persistent failure to meet a child or young person's basic physical and/or psychological need, likely to result in the serious impairment of the child's/young person's health or development. Neglect may involve failing to protect a child or young person from physical and emotional harm or danger or being unresponsive to their basic emotional needs.

5.2 Mental Health

Teenage years are when good mental health patterns are developed. Young people can have a range of experiences which may affect their ability to build emotional resilience and their ongoing psychological development. The types of challenges that young people may experience include:

- family breakdown
- pressure to have access to money
- body image pressure
- 24-hour social networking
- Bullying on and offline

- early sexualisation
- academic pressure.

The guidelines in this policy relate to not just abuse but also any concerns that arise regarding mental health.

Young people may seem distressed, distant or retracting 'into themselves', may seem to have developed very low self-esteem, weight loss, may be self-harming, showing signs of being particularly depressed or even 'hyper'.

6.0 Good practice guidelines

All adults working with Career Ready, in whatever capacity, should demonstrate exemplary behaviour. The following are common sense examples of how to create a positive culture and environment. Following these guidelines will serve as protection for adults working with Career Ready as it will help to prevent inappropriate situations from arising.

6.1 Mentoring best practice

Career Ready processes all DBS/PVG clearance for mentors. When a mentor has begun the DBS/PVG clearance process, but has not received full clearance, Career Ready policy is that:

- The mentor and student meet only in a school/college setting which is supervised (i.e., in the library in sight of a member of staff)
- The mentor and student do not exchange contact details. Arrangements for the next meeting should be confirmed at the current meeting or facilitated by a member of staff.

The Career Ready programme is delivered at school/college level and therefore implementation of the Career Ready Safeguarding Policy is the responsibility of the school/college/local authority. Where the school/college/local authority policy does not align with the Career Ready policy, then Career Ready must be informed how relationships between mentors not cleared and their allocated student are being managed.

For example:

- If a school/college/local authority wants mentors and students to meet external to the school/college before clearance is gained, written notice must be given to Career Ready.
- If a school/college/local authority wants student contact details to be shared with mentors who are not cleared, using the Career Ready dashboard, written consent must be given to Career Ready

6.2 What good practice means

- Where possible, work in an open environment, avoiding private situations and encouraging open communication
- Treat all Career Ready students with respect and dignity
- Always prioritise the welfare of each Career Ready student
- Maintain an appropriate distance from the Career Ready student
- Put the Career Ready student based in an office in a space with other people around
- Keep doors open and blinds up, if a staff member is alone in a room with a Career Ready student, unless there is an issue of confidentiality
- Be an excellent role model e.g. not smoking in the company of the student
- Give enthusiastic and constructive feedback where possible rather than negative criticism
- If the need arises, administer emergency first aid and/or other medical treatment, but this must be reported in line with the hosting organisation's/venue's policy and procedure, and Career Ready must be notified
- Report any incidents (see below)
- Not spending unnecessary amounts of time alone with a Career Ready student away from others
- Not taking or dropping off a Career Ready student by car to another location
- Not saying or doing anything that might be interpreted as aggressive or hostile
- Not doing things of a personal nature for a Career Ready student that they can do for themselves

Under no circumstances should any adult working with Career Ready:

- Engage in rough physical or sexually provocative games
- Allow or engage in any form of inappropriate touching
- Allow Career Ready students to use inappropriate language unchallenged
- Make sexually suggestive comments to a Career Ready student
- Meet with their student in an inappropriate place, e.g., a nightclub
- Allow allegations made by a Career Ready student to go unchallenged, unrecorded or not acted upon
- Fail to report to Career Ready anything inappropriate that the student does or says.

6.3 Incidents that must be reported/recorded

If you witness or are a party to any of the following, as an adult working with Career Ready, you should report this immediately to the Career Ready Designated Safeguarding Officer (see pages 8 & 12 for contact details) and record the incident.

- You hurt a Career Ready student, even if unintentionally

- You witness any inappropriate behaviour, whether from another adult or from another Career Ready student
- The student seems distressed
- The student mentions they are in danger at home or school
- The student mentions they want to harm themselves/others
- The student appears to be physically attracted to you or to another adult
- The student misunderstands or misinterprets something you have done
- The student makes suggestive or inappropriate comments, either in person, online or using any other form of communication.

You should always feel confident to voice concerns about the attitude or actions of colleagues. Where a Career Ready student is on an internship, the internship employer is expected to notify Career Ready and the school/college immediately upon becoming aware of any safeguarding/child protection issues.

7.0 Career Ready Events

Career Ready has a duty of care towards students who are participating in Career Ready organised events, i.e. launch events. This duty of care covers the duration of the event from the designated meeting point until the event finishes. Career Ready is responsible for undertaking, or obtaining from the venue, a risk assessment for the visit and ensuring there are an adequate number of qualified first aid staff present.

7.1 When a teacher/ school/college representative attends an event with students

When a teacher or other school/college representative is attending with students, the students remain in the duty of care of the school/college. Schools/Colleges are responsible for assessing any risks related to visits. Career Ready will request risk assessment information from venue hosts if it is required. It is expected that the school/college representative takes full responsibility for their students for the entire duration of the visit.

7.2 When students attend an event independently of the school/college

Career Ready expects students to travel to any event/visit either independently or under the supervision of the school/college. It is the responsibility of the school to provide risk assessments and consent forms/letters that can be passed to parents for any specific events/visits. Coordinators are expected to attend Career Ready events with students. Where this is not possible, Career Ready staff should ensure that they have emergency contact details for each student that attends and should call a parent/carer should a student become unwell or if there is a concern regarding the student's welfare.

Career Ready accepts no responsibility for personal belongings brought by students to events.

7.3 Staff ratios and supervision

Each Local Authority defines the appropriate number of staff for trips and visits and therefore it is the responsibility of the school or college to ensure they send enough staff as per their school/college/local authority guidelines. Career Ready follows a guideline of one member of staff for every 15-20 students. These members of staff may include adults from the hosting organisation who support the event.

8.0 Communications

8.1 Electronic Communication

Communication between Career Ready staff and students must take place within clear professional boundaries, and staff must ensure that all communication is transparent and open to scrutiny. Career Ready staff must use their Career Ready mobile phone to contact students, rather than sharing their personal phone number. If their Career Ready phone is damaged, not working or lost, and staff must call the student, then they may use their personal phone but ensure their number is blocked and do not share their personal number with the student. Staff may only communicate with students on social media via the official Career Ready social media outlets. Personal phones may be used by staff when acting as mentors.

8.2 Online Safety and Digital Safeguarding

Career Ready recognises that safeguarding risks can arise through the use of digital technology and online activity. These risks may occur during Career Ready programme delivery including virtual mentor meetings, working from home during internships or during communication outside of organised activities. The risks include, but are not limited to, cyberbullying, harassment, grooming and online exploitation, exposure to inappropriate or harmful content, misinformation, disinformation or conspiracy theories, the misuse of digital technology including AI-generated content. All volunteers working with Career Ready must maintain the same professional standards and boundaries online as they would face-to-face, keeping electronic communication professional, transparent and appropriate at all times.

8.3 Photography and Videos

Career Ready will take photos and videos at events and Career Ready activities. Career Ready will gain permission from students before using the photos. Students will be asked to sign a Photography Permission Form. Media captured will be used for promotional purposes only. Promotional purposes include; official Career Ready social media, website and Career Ready publications. Where an employer partner wishes to take photographs of students at an event, they will need to gain the students permission via their own Photography Consent Form.

9.0 Recruitment

All Career Ready staff, trustees, board members and mentors (volunteers) are to have Disclosure and Barring Service (DBS) checks or PVG checks depending on where in the UK they are based. DBS certificates are reviewed and renewed every three years. From 1 April

2026, PVG scheme membership in Scotland will move to a five-year model. New and existing members who submit an application from this date, will have membership that lasts for five years and must then be renewed to remain in the scheme.

Existing PVG members will be moved from lifetime membership to the five-year scheme in phases and will be notified directly by Disclosure Scotland when this takes place.

Career Ready uses the DBS Update Service where appropriate.

Should there be any conviction information revealed by the DBS/PVG, this will be followed up by a member of Career Ready staff. If any criminal record is found, Career Ready will deal with this on a case-by-case basis and if it is found that it is not suitable for the individual to volunteer as a mentor on the programme, the individual will be excluded.

CR will keep DBS/PVG records, monitor and report to the Board/sub-committee quarterly on:

- Status of DBS/PVG applications for any new recruits
- Number of 3-year term DBS re-applications pending / 5 years for PVG as of 1 April 2026

New Appointments

- DBS/PVG applications for new staff recruits must be completed before employment starts.
- DBS/PVG applications for new Board candidates must be completed within 4 weeks of their first Board meeting and they will not be ratified until this check is approved.
- DBS checks must be carried out every 3 years on staff and trustees. PVG checks every 5 years.
- Trustees may not attend CR events without a valid DBS/PVG check in place, nor may they vote without this in place.

Employees, trustees and mentors will be trained so they know how to deal with any safeguarding concerns and will be in possession of the Career Ready Safeguarding Policy. Volunteers, internship providers and student participants will be informed about the safeguarding policy and the procedures that are to be followed should any issues arise. All adults working with Career Ready are personally responsible for safeguarding their own safety, maintaining professional boundaries, and complying with the good practice guidelines set out in this policy.

10.0 Systems and procedures

Any concerns must be directed initially to the school/college's Career Ready coordinator, and to either:

- Designated Safeguarding Officer:
Sian Robertson (sian.robertson@careerready.org.uk) 07525754829

OR

- Deputy Designated Safeguarding Officers:
Janine McFarland (Scotland) (janine.mcfarland@careerready.org.uk) 07717281930
Emily Smith (England) (emily.smith@careerready.org.uk) 07591950311
Sophie Childs (England) (sophie.childs@careerready.org.uk) 07801428034
- Once a concern has been discussed the appropriate action will be taken and authorities will be notified, if necessary, in accordance with the Response Procedure set out below.
- Career Ready treats these matters with the utmost confidentiality, in accordance with the Confidentiality Guidelines set out below.
- Good practice guidelines have been outlined in this Policy and therefore all staff, and any person issued with a copy of this Policy or made aware of it, are considered to be aware of the way they are to conduct themselves.
- Career Ready is aware of the fact that it may be difficult to establish cases of abuse, and therefore our role is to record and pass information on to the school/college Safeguarding Officer who must then liaise as appropriate with experts in social services and other authorities, or directly to the local authority should a school/college Safeguarding Officer not be available, i.e. during school holidays.

10.1 Procedure for responding to safeguarding and child protections concerns

If you, as an adult working with Career Ready, are informed about a concern, you should:

- Make it your priority as such issues need to be dealt with as quickly as possible
- Listen carefully to the concern that is being raised
- Try not to ask leading questions, as these may influence the answers, and distort the evidence
- Record the concern in writing, making an effort to use the exact words the subject has used in order to be as accurate as possible. Details such as names, dates, times, and location should all be recorded
- Once you have established the problem, reassure the young person and indicate how you will act in a way that is best for the young person's safety
- Make it clear that you cannot guarantee absolute confidentiality as a Designated Contact must be informed. Social services and other authorities may also need to be notified. It is important to show the young person that such information will only be shared with people that will help to ensure the young person's safety and well-being. All information will be shared only via secure channels such as electronic mail.
- Inform the Designated Contact immediately

- The Designated Contact should not carry out an investigation but should review the information and ALWAYS pass to the school/college Safeguarding Officer, or where applicable, Local Authority contact. It is the responsibility of the school/college Safeguarding Officer/ Local Authority contact to then take the necessary action to ensure the situation is resolved / addressed appropriately. Career Ready's responsibility is to follow through on actions allocated. Assistance will be provided to external investigators.

Provided that it is possible to do so without impeding the investigation or posing any risk to the young person's safety, Career Ready recommends to the school/college that:

- The parents/carers of the young person involved should be informed of the allegation and kept informed of any progress. If there has been any physical injury to the young person, the parents/carers should be informed immediately.
- The subject of the allegations should be informed of them, and of the progress of the investigation. Given the potential damage to career/reputation, Career Ready will always treat matters sensitively and with an open mind.

Once the investigation has concluded, Career Ready senior managers must then take any necessary steps if the matter involved a member of staff or volunteer.

10.2 Specific Roles

Due to the type of work that Career Ready is involved in, the way in which concerns and allegations are dealt with may vary depending on who the subject of allegation is and what their role and interaction with the child/young person involves. When concerns are reported, all adults working with Career Ready should follow the response guidelines set out above, using the processes described in Appendix 1. However, the subsequent steps may differ depending on the individual's role:

10.2.1 Internship Volunteers: In the case where a complaint is made about an individual involved in a student's internship, Career Ready staff will speak with a senior manager from the individual's organisation to review the evidence and consider the seriousness of the allegations. The student must pause participation in the internship until the outcome is determined and next steps decided upon. In the case that it is decided that the individual is not suitable to continue participating in the internship, the internship will be stopped, and the student will be moved to another internship where this is possible. If no criminal offence has been committed but the individual's behaviour was deemed to be inappropriate, the individual's employer will be responsible for taking disciplinary action. If a criminal offence has been committed the police (and any other relevant body) will be contacted to take the matter further.

10.2.2 Mentors: If an allegation is made against a mentor, Career Ready staff will look for any inappropriate content that has been shared and, in the cases, where this

is found, it will be recorded. Both mentor and mentee will be consulted to discuss the matter and may be withdrawn from the programme if necessary.

10.2.3 Peer-to-peer: Career Ready recognise that safeguarding concerns may arise if a Career Ready student displays harmful or inappropriate behaviour towards another student on the programme. Such behaviour is referred to as child-on-child/peer-to-peer abuse. This may include, but is not limited to, sexual violence or harassment, bullying, coercive or controlling behaviour, physical harm, or the sharing of inappropriate or indecent images or messages. All allegations will be taken seriously, and Career Ready will work with schools/colleges and employers to resolve any concerns in line with safeguarding policies and the relevant/appropriate safeguarding professionals. Inappropriate behaviour toward another student may result in removal from the programme.

10.3 Confidentiality

Career Ready will make every effort to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the young person, parents and accused person (where this would not place the young person at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect young people, facilitate enquiries, or manage related disciplinary or suitability processes.

10.4 Disciplinary Action and Suspension

Where disciplinary action is taken against Career Ready employees, it should be done so in accordance with Career Ready's disciplinary policy. It may be necessary to suspend the individual against whom allegations have been made if, for example:

- There is cause to suspect a child/ young person is at risk of significant harm; or
- The allegation warrants investigation by the police; or
- The allegation is so serious that it might be grounds for dismissal.

Career Ready will not suspend an employee for longer than is reasonably necessary, and the employee will continue to receive full pay and benefits during any period of suspension.

If the individual in question is not a Career Ready employee, we will liaise with the relevant organisation (e.g. the individual's employer) to determine what disciplinary action should be taken. Career Ready may terminate an individual's participation in the programme with immediate effect.

10.5 Record-Keeping

Career Ready will keep a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and details of any action taken and decisions reached. This will be recorded on the Safeguarding spreadsheet, a confidential single central record which is only accessed by authorised staff members. This information will only be shared with third parties (i.e. police, social services) when required and is in the best interest of the child/young person. Information will also be saved on the individual's confidential file (student, volunteer or staff).

10.6 Timing

It is in everyone's interest to resolve cases as quickly as possible, consistent with a fair and thorough investigation. Career Ready will make every effort to avoid any unnecessary delay. However, the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness, and complexity of the allegation.

10.7 Conclusion of Investigation

If the allegation is substantiated, the individual may be dismissed from Career Ready, or their participation in the Career Ready programme may be terminated. Further action may be pursued by the relevant authorities. Career Ready will make any notifications that are required by law. If it is decided on the conclusion of the case that a person who has been suspended can return to work Career Ready will consider how best to facilitate that.

If an allegation is determined to be unfounded or malicious, Career Ready will alert the relevant people or external bodies. In the rare event that an allegation is shown to have been deliberately invented or malicious, Career Ready will ask the police to consider whether any action might be appropriate against the person responsible.

Career Ready is aware of the importance of balancing the welfare of the young person against the potential damage that can be caused to an individual's career and reputation. All cases will be dealt with in a sensitive manner and in a carefully measured way. In cases of abuse Career Ready will ensure that the young person is put in contact with social services and/or other relevant bodies so that the necessary support is provided.

11.0 Contacts

Initial enquiries: safeguarding@careerready.org.uk

11.1 Designated Safeguarding Lead (DSL) + Senior Lead for Safeguarding

Name: Sian Robertson, Interim Co-CEO

Phone/Email: 07525754829 sian.robertson@careerready.org.uk

11.2 Deputy DSO (England)

Name: Emily Smith, Head of Programme (England)

Phone/Email: 07591950311 emily.smith@careerready.org.uk

Name: Sophie Childs, Programme Lead (England)

Phone/Email: 07506628834 sophie.childs@careerready.org.uk

11.3 Deputy DSO (Scotland)

Name: Janine McFarland, Head of Programme and Operations (Scotland)

Phone/Email: 07717281930 janine.mcfarland@careerready.org.uk

11.4 PVG Officer for Scotland:

Laura Tanton: laura.tanton@careerready.org.uk

11.5 DBS Officer for England:

Caroline Fairman: caroline.fairman@careerready.org.uk

12.0 Further Information

NSPCC

NSPCC Helpline: 0808 800 5000

Text phone: 0800 056 0566

Weston House

42 Curtain Road

London

EC2A 3NH

13.0 Appendices

Appendix One: Process for managing a disclosure or concern

13.1 Appendix One: Internal Career Ready Processing Process

Please follow this process to report and process disclosures

Step one

Disclosure reported to Career Ready. The source may be one of:

- Student
- Volunteer (mentor or internship supervisor etc.)
- Teacher/Coordinator
- Other connected to one of the above

Inform the Career Ready Senior Manager for Safeguarding

Step two

Log disclosure on the Safeguarding Spreadsheet (Single Central Record -SCR) and create a folder in the secured Safeguarding folder on shared drive to save the emails and other correspondence in relation to the disclosure.

Step three

Depending upon the person making the disclosure, it may be necessary to inform one or more of the following people:

- School or college Safeguarding Officer
- Employee's manager
- Employer HR Manager
- School or College Coordinator
- Others

From this point, please follow the section on 'Systems and Processes' outlined earlier in the policy.