Debate Mate Schools Ltd and Debate Mate Ltd (DMLTD) Safeguarding and Child Protection Policy and Procedures

Reviewed September 2026 against Working Together to Safeguard Children 2026, Keeping Children Safe in Education 2026, the Crime and Policing Act 2026 and the Children's Wellbeing and Schools Act 2026

POLICY

1 POLICY STATEMENT

1.1 All children without exception have the right to protection from abuse regardless of age, disability, race, religion or belief, sex, sexual orientation, gender reassignment or any other characteristic protected under the Equality Act 2010, and regardless of their background or circumstances. As an organisation working with children and young people, Debate Mate Schools Ltd. and Debate Mate Training Ltd. and its Debate Mate programmes ("DMLTD"), has a clear part to play in ensuring children's welfare and safeguarding them from harm.

1.2 The welfare of the child is paramount in any of DMLTD's activities. DMLTD believes that a child or a young person should never experience abuse of any kind. DMLTD has a responsibility to promote the welfare of all children and young people and to keep them safe. DMLTD is committed to operate in a way that protects them. DMLTD takes a child-centred approach: it listens to children and young people, takes their views, wishes and feelings seriously, and is committed to anti-discriminatory and anti-racist practice, recognising that bias and discrimination can prevent children from being seen, heard and protected.

1.3 The policy is approved and endorsed by the Board of Trustees (approved October 2026, following the September 2026 review).

1.4 The policy sets out what is understood by the term 'child protection', as well as what to do when in contact with a young person who discloses abuse.

1.5 Any child or young person who signs up with DMLTD will be able to view this policy and procedures on our website (www.debatemate.org/policies) alongside our Child Friendly version of this policy.

2 SCOPE

2.1 This policy applies to all trustees, employees, mentors, independent contractors, agency staff and volunteers of DMLTD who come into contact with young people, whether in person or online, including those who mentor on any programmes ("Staff").

2.2 This policy has been drawn up on the basis of law and guidance that seeks to protect children, including:

- Children Act 1989
- United Nations Convention on the Rights of the Child (UNCRC), ratified by the UK in 1991

- Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), as amended by the Data (Use and Access) Act 2025
- Human Rights Act 1998
- Sexual Offences Act 2003 (as amended)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Counter-Terrorism and Security Act 2015 (the Prevent duty)
- Modern Slavery Act 2015
- Serious Crime Act 2015 (including the mandatory reporting duty for female genital mutilation)
- Domestic Abuse Act 2021
- Online Safety Act 2023
- Crime and Policing Act 2026 (including the duty to report child sexual abuse and the removal of the supervision exemption from regulated activity)
- Children's Wellbeing and Schools Act 2026
- 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; Department for Education and Department of Health 2015
- Information sharing advice for safeguarding practitioners; Department for Education 2024
- Working Together to Safeguard Children 2026: statutory guidance on multi-agency working to help, protect and promote the welfare of children; HM Government 2026
- Keeping Children Safe in Education 2026, statutory guidance for schools and colleges (in force from 1 September 2026); Department for Education 2026
- Prevent duty guidance: England and Wales; Home Office 2023
- After-school clubs, community activities and tuition: safeguarding guidance for providers; Department for Education (updated February 2026)
- Safeguarding and protecting people for charities and trustees, and how to report a serious incident in your charity; Charity Commission

2.3 This policy should be read alongside DMLTD's policies and procedures on:

- Employee Expectations (which set out the staff code of conduct and behaviour standards, including the route for low-level concerns at 8.10)
- Mentor Memorandum of Understanding
- Photography, Filming and Sharing Images Policy
- Anti-Harassment and Bullying
- Grievance and Disciplinary
- Whistleblowing
- Health and Safety
- Online Safeguarding Protocol
- Safer Recruitment Policy

- Equity, Diversity and Inclusion Policy
- Data Protection, Information Sharing and Records Retention Policy
- Media Consent Form
- Safeguarding Risk Assessment

2.4 The policy and framework applies to all young people under 18, including those who are classified as children under The Children Act 1989.

2.5 Where DMLTD works with young people aged 18 or over (for example, sixth-form students), or with adults who may be at risk, concerns will be passed to the DSL and referred in line with the Care Act 2014 and local adult safeguarding procedures.

2.6 Where DMLTD activity takes place in Wales, Scotland or Northern Ireland, Staff will follow this policy together with the host setting's procedures and the relevant national arrangements (the Wales Safeguarding Procedures; the National Guidance for Child Protection in Scotland; and Co-operating to Safeguard Children and Young People in Northern Ireland), and the equivalent vetting scheme will be used (the PVG Scheme in Scotland and AccessNI in Northern Ireland). Where DMLTD works internationally or with overseas partners, it will follow the Charity Commission's guidance on managing risks when working internationally and any local legal reporting requirements.

3 PRINCIPLES

3.1 Child protection consists of two key areas:

3.1.1 The safety of the environment both online and off-line, including the suitability of volunteers, trustees, employees and independent contractors to work with children and young people.

3.1.2 Responding to concerns about children and young people who come into contact with DMLTD.

3.2 Protecting young people from harm is everyone's business; it is not a responsibility that can be passed on to someone else, be they a mentor, affiliate teacher, Programme Director, or collaborating agency. All Staff are expected to show professional curiosity and, where they believe a child is not being protected, to escalate their concern and respectfully challenge decisions, including those of partner agencies.

3.3 All operational and managerial decisions and administrative practice will be compliant with this policy.

3.4 The Executive Director and a DMLTD Advisory group consisting of the Chief Executive Officer, a trustee and nominated mentors of the programme team, will review the policy at least annually, and sooner if needed (for example, following changes to legislation or statutory guidance, a serious incident, or learning from a safeguarding practice review). The reviewed policy will be approved by the Board of Trustees.

3.5 The Designated Safeguarding Lead is: Enayah Byramjee ("DSL"). In her absence, Jessica Dix, Dominic Smith and Ffion Beynon will deputise.

3.5.1 The DSL and Deputies will be provided with DSL-level child protection training at least every two years, with their knowledge and skills refreshed at least annually (for example, through briefings and bulletin updates). Training will include online safety, Prevent awareness and the management of allegations against staff. It is their responsibility to periodically review DMLTD activity and feedback from young people where a child protection issue is disclosed to ensure that an adequate response was given. Current-awareness sources will include the NSPCC's CASPAR bulletin, GOV.UK alerts for updates to Keeping Children Safe in Education and Working Together to Safeguard Children, and regular contact with an external safeguarding specialist. A CPD record will be kept for the DSL and each Deputy.

3.5.2 The DSL will ensure that all Staff are made aware of the procedures and what they should do if they have concerns about a service user.

3.5.3 The DSL will offer Staff support when dealing with any child protection concerns from service users.

3.5.4 The DSL or a Deputy will be available during all DMLTD delivery, including virtual sessions, evening activity and events. Cover arrangements for absences and holidays will be agreed in advance and communicated to all Staff.

3.5.5 The DSL will keep up to date with the local safeguarding partner arrangements in the areas where DMLTD delivers, and will make referrals to Family Help, children's social care, the police, the Local Authority Designated Officer (LADO) and Prevent as appropriate.

3.6 The Chief Executive Officer will be responsible for ensuring this policy is implemented.

3.7 The Chief Executive Officer will be responsible for ensuring that this policy is implemented alongside the policy requirements stipulated by third party agencies, such as schools, youth centres, etc, wherever DMLTD activity or collaboration takes place.

3.8 The Board of Trustees retains ultimate responsibility for safeguarding, in line with the Charity Commission's guidance Safeguarding and protecting people for charities and trustees. A named Safeguarding Trustee, will oversee safeguarding on behalf of the Board. The DSL will provide a safeguarding report to the Board at least termly, including anonymised data on concerns, referrals, allegations, training compliance and safer recruitment, and the Board will ensure that serious safeguarding incidents are reported promptly to the Charity Commission.

3.9 In line with Working Together to Safeguard Children 2026, DMLTD will identify, understand and challenge racism, discrimination and bias in safeguarding practice. Staff will recognise that some children face additional barriers to being heard and protected, including children with special educational needs and disabilities (SEND), children in care and care-experienced young people,

young carers, children who are lesbian, gay, bisexual or gender questioning, and children from minority ethnic and faith communities.

3.10 Working in partner schools. DMLTD delivers most of its programmes in schools as an external provider. The school retains statutory responsibility for safeguarding its pupils under section 175 of the Education Act 2002 and Keeping Children Safe in Education 2026, and DMLTD Staff must follow the host school's safeguarding procedures alongside this policy. Before delivery begins, DMLTD will agree with each school: who the school's Designated Safeguarding Lead is and how to reach them during sessions; the arrangements for supervision of mentors and any accompanying volunteers; and what assurance the school requires under Part Three of Keeping Children Safe in Education 2026 in respect of contractors and visitors (for example, confirmation of DBS checks, training records and a copy of this policy). Concerns about a pupil will be reported to DMLTD's DSL and to the school's DSL, who will lead on any referral to children's social care, Family Help, the police or the Local Authority Designated Officer. The Children's Wellbeing and Schools Act 2026 strengthens the role of education in local safeguarding arrangements, and DMLTD will support partner schools in meeting those expectations.

PROCEDURE

4 WHAT IS A CHILD PROTECTION ISSUE?

4.1 A child protection issue includes any disclosure or allegation of the abuse of a young person (under 18). Abuse includes:

4.1.1 Sexual abuse involves forcing or enticing a child or children to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact or non-contact activities or on-line activity, such as involving children in looking at, or in the production of pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males, women can also commit acts of sexual abuse as can other children (child on child abuse). Sexual abuse includes creating, possessing or sharing indecent images of children, including images that have been digitally altered or wholly generated using artificial intelligence (sometimes described as 'deepfakes').

4.1.2 Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates symptoms or deliberately induces illness in a child.

4.1.3 Emotional abuse is the persistent emotional mistreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless and unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the

child opportunities to express their views, deliberately silencing them, "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including online bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of mistreatment of a child, though it may occur alone.

4.1.4 Neglect is the persistent failure to meet a child's basic physical and / or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve failing to provide adequate food, clothing and shelter including exclusion from home or abandonment; failure to protect a child from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of adequate care takers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4.1.5 Other forms of abuse and harm include: child sexual exploitation (CSE); child criminal exploitation (CCE), including county lines and 'cuckooing', which are specific criminal offences created by the Crime and Policing Act 2026; financial exploitation; modern slavery and trafficking; serious violence, including carrying, threatening to use or using weapons; female genital mutilation (FGM), forced marriage and so-called 'honour'-based abuse; abuse linked to faith or belief, such as spirit possession or witchcraft; radicalisation and extremism; online abuse; bullying; and domestic abuse. Children who are exploited are victims, even where they appear to have agreed to the activity.

4.1.6 Domestic abuse: under the Domestic Abuse Act 2021, children who see, hear or experience the effects of domestic abuse are victims in their own right. Domestic abuse includes coercive and controlling behaviour and can also occur in young people's own relationships (teenage relationship abuse) and as child-to-parent or caregiver abuse.

4.1.7 Child-on-child abuse (including harassment and violence): children can abuse other children, in person and online. This includes bullying (including prejudice-based bullying); physical abuse; sexual violence and sexual harassment; harmful sexual behaviour; upskirting; initiation or hazing-type violence; and the consensual or non-consensual sharing of nude or semi-nude images. DMLTD recognises that misogyny can underpin harmful sexual behaviour and violence against women and girls, and that child-on-child abuse is a safeguarding issue for both the child who has been harmed and the child who has caused harm. Staff must never dismiss such behaviour as 'banter', 'having a laugh' or 'part of growing up'.

4.1.8 Online harm and artificial intelligence: online risks can be grouped as content, contact, conduct and commerce. They include exposure to illegal or harmful content (including misinformation, disinformation and conspiracy theories), grooming, sexual extortion ('sextortion'), including financially motivated sextortion, and the creation or sharing of AI-generated or manipulated sexual images. Every incident involving nude or semi-nude images of a person under 18, whether consensual or not and whether real or AI-generated, requires a safeguarding response and must be reported to the DSL. Staff must never view, copy, forward, save or delete such images.

4.1.9 Radicalisation and extremism: children can be drawn into extremism through any ideology, including where the ideology is mixed, unclear or unstable, or where a child shows a fascination with violence. Concerns must be passed to the DSL, who will apply the 'notice, check, share' approach in the Prevent duty guidance and make a Prevent referral where appropriate.

4.1.10 Mental health: mental health difficulties can be an indicator that a child has suffered, or is at risk of, abuse, neglect or exploitation. Any concern about a child's mental health that is also a safeguarding concern, including self-harm or suicidal thoughts, must be reported to the DSL immediately.

4.2 A child protection issue also includes situations in which a young person is suffering or could suffer significant harm, which includes self-harm, suicidal thoughts or attempted suicide, rape or sexual assault, and going missing from home, care or education.

4.3 Abuse is not always obvious, and there are many reasons why children may not tell anyone that they are being abused. They may not even realise that what is happening to them is abusive. Children and young people can also experience different types of abuse at the same time. For example, all abuse involves an element of emotional abuse and neglect often occurs in contexts where children are also being subjected to physical and sexual abuse. Working Together to Safeguard Children 2026 highlights that children may experience multiple or simultaneous harms, both within the family and outside it (extra-familial harm), including exploitation by groups. Staff should consider the wider context of a child's life, including peer groups, school, community and online spaces.

4.4 In terms of specific signs and indicators, sometimes there are physical signs, such as: unexplained bruises or other injuries or health problems; unexplained gifts or additional mobile devices; poor appearance or hygiene; recurring health problems that are not treated; pregnancy or sexually transmitted infections; any signs that a child/young person is at risk of being subjected to forced marriage or FGM.

4.5 A child's behaviour can also indicate whether they are being abused. Look out for signs that a child is unsettled or unhappy; withdrawn; suddenly behaves differently; anxiety; clingy; depressed; aggressive; problems sleeping; eating disorders / changes in eating habits; takes risks; misses school; obsessive behaviour; nightmares; drugs; alcohol; self-harm; thoughts about suicide; secrecy about online activity or new online contacts; unexplained money, possessions or travel;

associating with older people or groups; carrying weapons; and expressing extreme, hateful or misogynistic views.

4.6 Some children may benefit from early support before concerns escalate. Following Working Together to Safeguard Children 2026, Family Help brings together targeted early help and support for children in need under section 17 of the Children Act 1989 into a single local offer. Staff should share with the DSL any emerging concerns (for example, about a young carer, a child who is persistently absent or not in school, a pregnant young person or young parent, or a family under significant pressure) so that the DSL can consider, with the school, whether a referral for Family Help is needed.

5 APPROPRIATE RESPONSES TO CHILD PROTECTION ISSUES RAISED BY A YOUNG PERSON

5.1 Any disclosure of a child protection issue by a young person to a member of Staff must be taken seriously and any suspected abuse must be reported immediately to the DSL at DMLTD. If the member of Staff feels the child is at immediate risk and should not leave the school premises, they will find the school's Designated Safeguarding Lead or a member of Senior Leadership and ensure they are informed of the concern. If the session is virtual and the member of Staff feels the child is in immediate danger, they need to contact one of Debate Mate's Designated Safeguarding Leads immediately. If a child is at immediate risk of serious harm and no DSL or school leader can be reached, Staff must call the police on 999 and then inform the DSL.

5.2 During their Induction and / or training, Staff will be trained on how to respond to a disclosure and how to follow up and inform the DSL at DMLTD in a confidential way using an online form (Appendix I: Guidance on Reporting a Disclosure). The DSL will inform the Designated Safeguarding Lead at the school the child attends and, where necessary, will make a referral to children's social care (for example, the Multi-Agency Safeguarding Hub or 'front door') or Family Help in the local authority where the child lives, and/or to the police.

5.3 There may be times when the young person does not want us to tell anyone about the abuse or dangerous situation they are in. The mentor's response should be:

"Thank you for telling me. I can't keep this a secret, because my job is to help keep you safe. I need to share what you've told me with the people whose job it is to help, such as Debate Mate's safeguarding lead and the school's safeguarding lead. I will only tell the people who need to know."

5.4 Mandatory reporting of child sexual abuse. The Crime and Policing Act 2026 (Royal Assent 29 April 2026) introduces a statutory duty on individuals undertaking regulated activity with children in England, and certain other specified roles, to report to the police or the local authority when they are made aware that a child is being sexually abused, because a child or a perpetrator tells them or because they witness it. DMLTD will comply with this duty from the date it comes into force and will follow the Government's statutory guidance on its operation.

5.4.1 A report under the duty must be made as soon as reasonably practicable. Only one report is required for each incident: Staff will normally meet the duty by reporting immediately to DMLTD's DSL (by

telephone and using Appendix I) and confirming that the DSL has made, or will shortly make, the report to the police or local authority. If a member of Staff cannot obtain that confirmation, or believes a report has not been made, they must report directly to the police or local authority children's social care. The legislation permits a report to be delayed, for a maximum of seven days, only in circumstances involving a risk to a child's life, so that the risk can be managed; any such decision will be taken by the DSL and recorded.

5.4.2 Failure to comply with the duty may lead to a referral to the Disclosure and Barring Service (DBS). Under the Act it will also be a criminal offence, punishable by up to seven years' imprisonment, for anyone to act with the intention of preventing a report required under the duty from being made. No trustee, manager, colleague or partner organisation may discourage, delay or prevent a report, and any attempt to do so will be treated as a safeguarding concern and a disciplinary matter.

5.4.3 The mandatory reporting duty sits alongside, and does not replace, DMLTD's requirement that all concerns about any form of abuse or harm, including suspicions, signs and indicators, are reported to the DSL without delay.

6 APPROPRIATE REFERRALS:

6.1 It is not within DMLTD's remit to work with the young person or persuade them to give permission to disclose confidential information to a third party. There are agencies (such as ChildLine & NSPCC) that are better placed to provide counselling to help a young person decide whether they want to disclose abuse to a statutory agency. Staff can signpost young people to Childline (0800 1111), including its Report Remove tool, run with the Internet Watch Foundation, which helps under-18s get nude or semi-nude images of themselves removed from the internet, and to CEOP to report online sexual abuse or grooming. Signposting never replaces reporting the concern to the DSL.

7 APPROPRIATE RESPONSES TO CHILD PROTECTION ISSUES REGARDING A YOUNG PERSON WHO IS NOT ON OUR PROGRAMMES

7.1 Should we have any concerns that a young person (who is not on one of our programmes but is, for example, attending a youth participation event) is being abused, the school or organisation that co-ordinated the child's visit to DMLTD should be informed.

7.2 If no school or organisation was involved and the parent / carer arranged the child's attendance, the children's social care service (for example, the Multi-Agency Safeguarding Hub or 'front door') of the local authority where the child lives should be informed, or the police if the child is in immediate danger.

7.3 Full registration forms, including the child's address, for young people participating in such activity should be held securely, and only for as long as necessary under DMLTD's records retention schedule, so that information can be shared with children's social care should this be necessary.

8 ALLEGATIONS AND CONCERNS ABOUT STAFF, MENTORS, VOLUNTEERS AND TRUSTEES

8.1 All Staff should be encouraged to raise any concerns they have about a colleague's behaviour regarding safeguarding and abuse, using the following procedure:

8.1.1 Any concerns that a mentor may have about another mentor or employee should be raised with the DSL, unless the concern is about the DSL, in which case it should be raised with the Executive Director.

8.1.2 Any concern that an employee has about a mentor should be raised with the DSL.

8.1.3 Any concern that an employee has about a fellow employee should be raised with the DSL. If the concern is regarding the DSL then it should be raised with the Executive Director. If the concern is regarding the Executive Director or Chief Executive Officer then it should be raised with the Chair of Trustees (or the Safeguarding Trustee) and another DSL or Deputy.

8.1.4 Concerns about a Trustee should be raised with the Chair of Trustees; concerns about the Chair should be raised with the Safeguarding Trustee. Staff may also contact the LADO directly, or the NSPCC Whistleblowing Advice Line (0800 028 0285), if they feel unable to raise a concern internally or believe it has not been acted on.

8.1.5 Where a concern relates to a member of Staff working in a school, the school's Designated Safeguarding Lead and headteacher will also be informed, and DMLTD will co-operate fully with the school's procedures under Part Four of Keeping Children Safe in Education 2026.

8.2 An allegation meets the 'harm threshold' where it is alleged that a member of Staff has: (a) behaved in a way that has harmed a child, or may have harmed a child; (b) possibly committed a criminal offence against or related to a child; © behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or (d) behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour outside work ('transferable risk').

8.3 Where the harm threshold may be met, the DSL (or, if the allegation concerns the DSL, the Executive Director or Chair of Trustees) will contact the relevant Local Authority Designated Officer ("LADO") within one working day and before any internal investigation begins. The police will be contacted immediately where a crime may have been committed or a child is at immediate risk, and children's social care will be contacted where a child may need help or protection. DMLTD will not interview the child, the member of Staff or witnesses, or gather evidence, until the LADO (and the police, where involved) have advised how to proceed.

8.4 Suspension will not be automatic. It will be considered case by case, in consultation with the LADO, where there is a risk to children, where the allegation warrants police investigation, or where it is so serious that it may be grounds for dismissal. Alternatives such as redeployment, additional supervision or removal from direct contact with children will be considered first. Suspension is a neutral act and does not imply guilt.

8.5 Any internal investigation will follow DMLTD's Disciplinary Policy once the LADO and, where involved, the police have agreed that it may proceed. Allegations will be dealt with quickly, fairly and consistently, and the member of Staff will be kept informed and offered support throughout.

8.6 Each allegation will be concluded as substantiated, malicious, false, unsubstantiated or unfounded, as defined in Keeping Children Safe in Education 2026. Where an allegation is substantiated, DMLTD will take appropriate action, which may include dismissal or ceasing to use the person's services. Where it is not substantiated, DMLTD will support the member of Staff's return to work where appropriate.

8.7 The LADO will be informed of the outcome. DMLTD has a legal duty under the Safeguarding Vulnerable Groups Act 2006 to refer a person to the DBS where it removes them from regulated activity with children (or would have done so had they not left) because they have harmed, or posed a risk of harm to, a child. Since 1 September 2026 this duty also applies to roles that were previously outside regulated activity only because the person was supervised. A referral will also be made to any relevant professional regulator, such as the Teaching Regulation Agency, where applicable.

8.8 Questions about the suitability of Staff to work with children and young people are not limited to situations where there is positive evidence of abuse. This could also include the failure to respond appropriately to the needs of children and young people. Records of allegations that are found to be malicious or false will be removed from personnel records. Records of all other allegations will be kept securely on the person's confidential personnel file until they reach normal pension age, or for 10 years from the date of the allegation if that is longer, and allegations that are not substantiated will not be referred to in employment references.

8.9 If DMLTD feels that a member of Staff is unsuitable to care for or work with children, the Chief Executive Officer will seek advice from the LADO.

8.10 Low-level concerns. A low-level concern is any concern, however small, that a member of Staff may have acted in a way that is inconsistent with DMLTD's code of conduct, including outside work, but that does not meet the harm threshold (for example, being over-friendly with a child, having favourites, contacting a child privately online, taking photographs of children on a personal device, or using humiliating language). All low-level concerns must be shared with the DSL, who will record them, look for patterns and take proportionate action. Staff are encouraged to self-report where they have found themselves in a situation that could be misinterpreted.

8.11 Where an allegation or safeguarding incident is serious, the Chair of Trustees will ensure that, in addition to reports to the statutory agencies, it is reported promptly to the Charity Commission as a serious incident and that the Board is informed.

8.12 Allegations of non-recent (historical) abuse will be taken seriously and referred to the LADO and/or police in the same way, as the alleged perpetrator may still pose a risk to children. Adults disclosing abuse they experienced as a child will be offered information about specialist support.

9 RECRUITMENT AND SELECTION OF STAFF AND MENTORS

9.1 It is recognised that some applicants may seek to work with young people in order to abuse them and that some applicants may have already shown themselves to be unfit to work with children and young people.

9.2 In recruiting Staff, DMLTD will follow a systematic selection process, designed to assess the applicant's suitability for the post and to work with children and vulnerable people. DMLTD's Safer Recruitment Policy contains the procedures for this.

9.3 All Staff at DMLTD may come into contact with young people, either through the programme or any other DMLTD projects or work. Therefore, mentors will be subject to an Enhanced DBS Disclosure including checking the Children's Barred list, at least every 2 years and employees will be subject to this every 3 years. Programme Directors will be given training on how to complete a DBS check during their Induction and Training.

9.4 Additional checks will be made to ensure that all the information provided by any potential employee or mentor is accurate. Specifically:

9.4.1 Application packs and where possible, recruitment adverts should contain the following statement: 'DMLTD has a responsibility to ensure that young people are protected. The recruitment process will include specific checks relating to child protection issues, which will be implemented for all applicants.' Adverts will also state that the role is exempt from the Rehabilitation of Offenders Act 1974, that shortlisted candidates will be asked to complete a criminal record self-declaration, and that online searches may be carried out as part of due diligence.

9.5 Regulated activity. From 1 September 2026, the Crime and Policing Act 2026 removed the 'supervision exemption' from the definition of regulated activity with children. Roles that involve teaching, training, instructing, caring for or supervising children, or providing advice or guidance on their physical, emotional or educational wellbeing, on a frequent basis, on more than three days in any 30-day period, or overnight between 2am and 6am (subject to the conditions set out in DBS guidance), are regulated activity whether or not the person is supervised. DMLTD will assess every employee, mentor, volunteer and contractor role against the updated definition and current DBS eligibility guidance.

9.6 DMLTD will not allow any person who is barred from regulated activity with children to work in such a role. It is a criminal offence for a barred person to work in regulated activity with children, including in roles that were previously exempt because they were supervised, and for an organisation knowingly to allow them to do so.

9.7 DMLTD does not currently use the DBS Update Service; disclosures are renewed at the intervals set out in 9.3. To manage the risk of information arising between checks, all Staff complete a written self-declaration each year, retained on file, covering any police investigation, arrest, caution, conviction, charge or barring referral. Staff must also tell the DSL immediately, and not wait for the

annual declaration, if any of these arise, or if they are asked to leave a role working with children elsewhere.

9.8 Candidates who have lived or worked outside the UK will be subject to additional checks, such as an overseas criminal records check or certificate of good conduct where available. Written confirmation that the appropriate checks have been completed will be obtained for agency and contracted staff, and a record of all checks will be kept in line with DMLTD's Safer Recruitment Policy. Where an overseas check cannot be obtained, DMLTD will record what was requested, why it was unavailable and the additional safeguards agreed instead, such as an overseas reference verified directly with the referee, an extended probationary period, or no unsupervised contact with children for an agreed period. The expectation, as for schools under Part Three of Keeping Children Safe in Education 2026, is that reasonable steps are taken and recorded rather than that a certificate is obtained in every case.

9.9 Occasional volunteers and visitors. DMLTD sometimes uses volunteers (for example, at competitions or showcase events) who are accompanied by DMLTD Staff throughout and who do not hold a DBS check. This is permitted only where the volunteer is supervised at all times, is never alone or one-to-one with a young person in person or online, and does not meet the frequency test for regulated activity (once a week or more, on more than three days in any 30-day period, or overnight). DMLTD will check their identity, brief them on expected conduct and on reporting concerns to the DSL, record the arrangement, and confirm the position with the host school in advance.

9.10 Because the Crime and Policing Act 2026 removed the supervision exemption from 1 September 2026, supervision alone no longer keeps a role outside regulated activity. Where a volunteer's involvement becomes regular, or where they will work unsupervised or one-to-one, DMLTD will obtain an Enhanced DBS check including the children's barred list before they continue. The DSL will review volunteer arrangements at least termly to identify anyone whose involvement has become frequent enough to require a check.

10 STAFF DEVELOPMENT AND BEHAVIOUR

10.1 The standards of behaviour expected of employees and mentors are outlined within the Employee Expectations document and the Mentor Memorandum of Understanding.

10.2 All employees will complete a probationary period, in which the employee's performance is closely monitored. Employees are only confirmed in post upon satisfactory completion of the probationary period of six months.

10.3 Training and support are provided for mentors before they begin working with children and throughout the academic year.

10.4 All Staff, including trustees, will complete safeguarding and child protection training (including online safety) at induction and before working with children, with refresher training at least annually and regular updates. Training will cover this policy, the 4 Rs, the mandatory reporting duty, low-level

concerns, whistleblowing and changes to legislation and statutory guidance. Training will be proportionate to role: all Staff and trustees will complete induction before any contact with children and an annual refresher of approximately 60 to 90 minutes; mentors will also receive a pre-programme briefing on the host school's safeguarding procedures and the identity of its Designated Safeguarding Lead; and the DSL and Deputies will complete DSL-level training every two years, as set out in 3.5.1. The date, content and attendance for every session will be recorded so that training can be evidenced to partner schools, funders and the Board.

10.5 Staff working in schools and colleges will read Part One of Keeping Children Safe in Education 2026 in full (the condensed Annex A has been withdrawn) and will confirm in writing that they have done so. Confirmation will be recorded through the Mentor Memorandum of Understanding and the employee induction checklist, and retained centrally so that it can be produced if a partner school asks for assurance.

10.6 When delivering online, Staff must follow the Online Safeguarding Protocol. In particular, they must use only DMLTD-approved platforms and accounts; never contact young people through personal social media, messaging apps, phone numbers or email; avoid one-to-one online contact unless it is authorised, risk-assessed and recorded; and never record sessions or capture images of young people except in line with the Photography, Filming and Sharing Images Policy and the relevant consent.

10.7 Staff must not upload photographs, recordings or personal information about young people into generative artificial intelligence (AI) tools, and must use AI only in line with DMLTD guidance and data protection law.

10.8 Staff must maintain professional boundaries at all times. Any sexual or romantic relationship, or sexualised communication, with a young person under 18 on a DMLTD programme is a serious breach of this policy and may be a criminal offence.

11 INFORMATION SHARING, RECORD KEEPING AND DATA PROTECTION

11.1 Fears about sharing information must never stand in the way of the need to safeguard and promote the welfare of children. DMLTD follows the Department for Education's Information sharing advice for safeguarding practitioners (2024).

11.2 Data protection law (the UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025) allows information to be shared for safeguarding purposes. Since 5 February 2026, safeguarding vulnerable individuals has been a 'recognised legitimate interest' under the UK GDPR, providing a lawful basis for sharing where necessary for that purpose, and special category information may be shared under the Data Protection Act 2018 condition for safeguarding children and individuals at risk. Consent is not required to share information where there is a safeguarding concern. Children and their parents or carers will normally be told that information is being shared, unless doing so would place a child at increased risk of harm.

11.3 The Children's Wellbeing and Schools Act 2026 introduces a new statutory duty on safeguarding partners and relevant agencies to share information relevant to safeguarding and promoting the welfare of children, and provides for a consistent identifier (single unique identifier) for children. Although DMLTD may not itself be a body to which the new duty applies, it will co-operate fully with partner schools, local authorities and multi-agency child protection teams, and will use any consistent child identifier where required.

11.4 All safeguarding concerns, discussions, decisions and actions, including the reasons for any decision not to refer, will be recorded promptly, accurately and factually on DMLTD's secure safeguarding reporting system. Access will be restricted to the DSL, Deputies and those with a clear need to know. Where a young person moves to another setting or programme, relevant safeguarding information will be shared securely with the receiving DSL.

11.5 Safeguarding records will be retained securely in line with DMLTD's records retention schedule, having regard to the recommendations of the Independent Inquiry into Child Sexual Abuse on the retention of records relating to child sexual abuse, and to the retention requirements for allegations set out in section 8.8.

12 CONTACT DETAILS

Designated Safeguarding Lead:
Name: Enayah Byramjee
Email: enayah@debatemate.com
Phone: 07989 973 576

CEOP (National Crime Agency) – report online sexual abuse or grooming: www.ceop.police.uk

ChildLine: 0800 1111 or www.childline.org.uk

NSPCC Helpline: 0808 800 5000 or help@nspcc.org.uk

NSPCC Whistleblowing Advice Line: 0800 028 0285

Police: 999 in an emergency; 101 for non-emergencies

Anti-Terrorist Hotline: 0800 789 321 (Prevent concerns: local authority Prevent team or police on 101)

LADO, children's social care and Family Help: contact details for each local authority in which DMLTD delivers are held in DMLTD's local contacts register

Charity Commission serious incident reporting: www.gov.uk/guidance/how-to-report-a-serious-incident-in-your-charity

Review Date: This policy will be due for review in October 2027, or sooner if legislation or statutory guidance changes (including on commencement of the mandatory reporting duty under the Crime and Policing Act 2026).

Appendix I: Guidance on Reporting a Disclosure

Safeguarding Guidance for Employees and Mentors

Key Information

The Designated Safeguarding Lead at Debate Mate is: Enayah Byramjee 07989 973 576 If you cannot contact Enayah, please call one of the Deputy Designated Safeguarding Lead: Ffion Beynon: 07454 446 782 Dominic Smith: 07728 937 814 Jess Rolfe-Dix 07701 077 487 **DO NOT contact your Programme Director. You must ONLY contact one of the DSLs or Deputies named above to discuss safeguarding concerns.**	**In-Person Club - if you believe that a child is in *immediate danger:*** Do not let them leave. Keep them with you, go to the school reception and ask to speak to the Safeguarding Lead in the school. This is unlikely to be the teacher supervising the club, and is more likely to be a member of the Senior Leadership Team, find out who they are and *only* disclose your concerns to them. If no Safeguarding Lead is available, make a member of Senior Leadership Team aware that you believe a child is in immediate danger. You should also contact the DSL at Debate Mate.

Virtual Club - if you believe that a child is in *immediate danger:*
You must contact Debate Mate's Designated Safeguarding Lead or one of the Deputies (listed above), immediately.

What is Safeguarding?

- Safeguarding means protecting children from maltreatment, whether within or outside the home and including online; preventing harm to children's mental and physical health or development; making sure children grow up with safe and effective care; and taking action so that all children have the best outcomes.
- Child Protection is the action taken to protect children who are being abused or who are at risk of abuse
- Child/ Young Person means anyone under the age of 18/ before their 18th birthday
- All people who work with or have regular contact with children have a **duty of care**. This means that everyone who comes into contact with children play a part in **identifying concerns, sharing information and taking prompt action.**

Your Role as a Mentor:

As a Mentor, you have a duty of care to the students you interact with. This involves the '4 Rs'.

R Recognise

- Recognise what abuse is, including definitions, signs, and indicators of abuse.

R Respond

- Respond appropriately to a child by actively listening, being aware of the barriers for the child. Reassure them they have done the right thing by telling you and make sure they know abuse is never their fault.

R Record

- Record all information as soon as possible and pass it on safely and securely to the person who needs to know. Keep the information secure.

R Report

- Report concerns to the Designated Safeguarding Lead, using the appropriate mechanisms. Some concerns, such as sexual abuse, will be covered by a new legal duty to report. Reporting to the school and Debate Mate's DSL straight away, and checking that the DSL has made the report, is how you meet that duty.

Recognise:

What is abuse?

Abuse and neglect are both forms of harm. They are either inflicting harm or failing to prevent it. Abuse happens both directly and indirectly, e.g. via the internet. These categories often overlap. Abuse can be carried out by adults or by other children, in person or online.

Physical Abuse - includes hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional Abuse - Persistent emotional harm to a child that causes a severe or long-lasting impact on their emotional development. It may involve saying to a child that they are worthless, unloved or inadequate. It may involve seeing or hearing abuse of another, including domestic abuse, meaning the child is frequently frightened. Some level of emotional abuse is involved in all types of maltreatment of a child but may also happen alone.

Sexual Abuse - involves forcing or persuading a young person to take part in sexual activities, forcing a child to see or be involved in sexual images or grooming of a child. It does not have to involve violence, and can be committed by men, women or other children (child-on-child abuse). It includes creating or sharing sexual images of children, including AI-generated or 'deepfake' images.

Neglect - involves the continual failure to meet a child's basic physical and emotional needs, such as providing sufficient food, clothing and a safe home. This is likely to lead to serious harm in the physical or emotional development of a child.

Exploitation - when a child is groomed, manipulated, coerced or threatened into sexual activity (child sexual exploitation), criminal activity such as carrying drugs, money or weapons (child criminal exploitation, including county lines), or handing over money or bank details (financial exploitation). A child who is exploited is a victim, even if they seem to have agreed.

Child-on-child abuse - abuse by one child towards another, including bullying, sexual harassment, sexual violence, physical abuse and sharing nude or semi-nude images (real or AI-generated). It is never 'just banter' and must always be reported.

What are the symptoms?

While these may be signs of abuse, there may be innocent explanations. Some of the signs and indications listed may be because, for example, the child has experienced bereavement or it may be a temporary illness in the family. **It is not your job to diagnose if it is abuse - but it is your job to notice concerns and act on them.**

Physical Abuse	Emotional Abuse	Sexual Abuse	Neglect
Bruising Nervous behaviour Bite or burn marks Self-harm Flinching Sudden behaviour changes Frequent absences Hinting at secrets Fear of a specific individual	Aggressive behaviour Nervous behaviour Lack of confidence Fear of making mistakes Self-harm Flinching Sudden behaviour changes Lack of friends Fear of a specific individual	Nervous behaviour Lack of confidence Fear of making mistakes Self-harm Flinching Sudden behaviour changes Lack of friends Hinting at secrets Fear of a specific individual	Nervous behaviour Lack of confidence Stealing food Sudden behaviour changes Frequent absences Lack of friends Fear of a specific individual

Respond:

Recognising and Responding won't always be a direct disclosure - someone may not come out and tell you that they are suffering from abuse. You may see or hear something, you may be concerned about another adult's behaviour towards a child or someone may tell you about a concern for someone else. If a child tells you something directly, this is called a disclosure. It is often sudden, unexpected, simply blurted out and sometimes the young person changes their mind and stops telling you.

Key things you should remember to do:

- **Stay Calm** - Do not show shock or disgust or panic. This includes your own personal opinion. You should avoid making statements like "They seem like a really horrible person." Saying things like "thank you for telling me that. That sounds like a worrying situation" would be more appropriate.
- **Listen Carefully** - Make sure you closely listen to exactly what they are telling you. You will need to write down what you hear later, as closely as possible to the child's exact words. Do not ask leading questions. It is your job to listen, not to investigate.
- **No Secrets** – Do not promise confidentiality or that you can keep secrets. You should tell the child that you may need to share this information with someone who can help. You can say something like "I will need to tell someone who can help you but I won't tell anyone who doesn't need to know" to reassure them.
- **Continue at the Child's pace** - Do not probe or ask too many questions if they don't want to. You can try to create a space for them to talk by saying things like "thank you for deciding to talk to me about this" and "it's okay – take your time." If a child starts telling you and then stops, you should still report it.
- **Reassure the Child -** Avoid making claims like "everything is going to be ok" but do say "Thank you for deciding to talk to me about this" or "I will do everything I can do to support you."

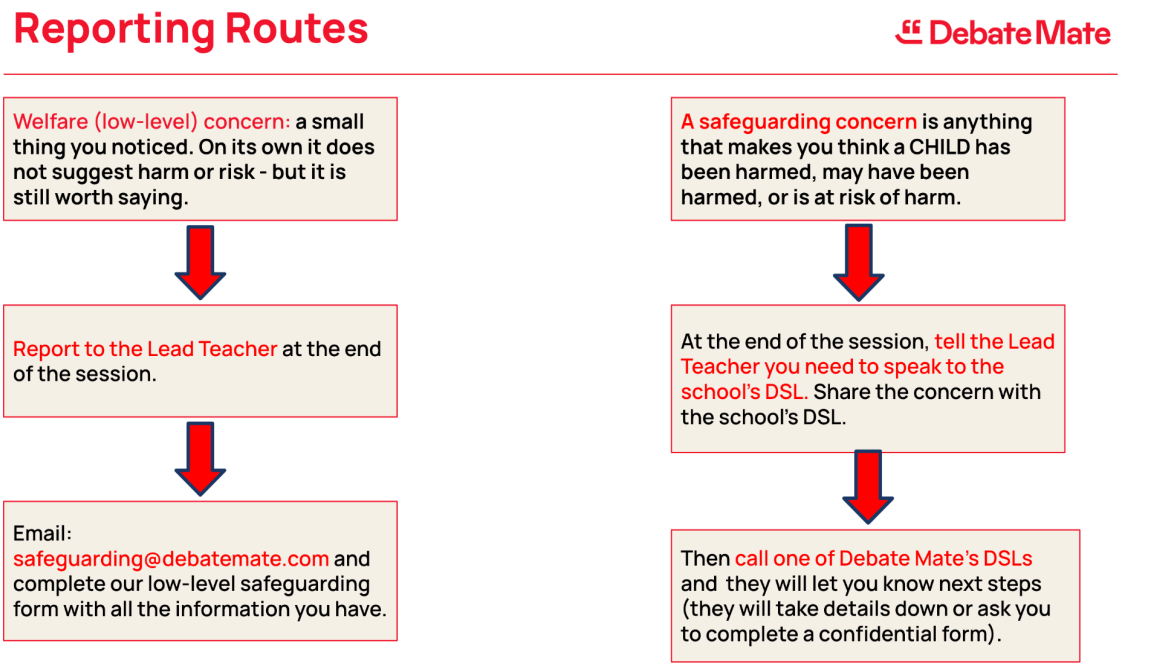
- **Next Steps -** Make it clear to the child that you will act on this. This may be by saying "I need to talk to someone who can help sort this out." If you think the child is in immediate danger, you need to keep the child with you and immediately inform the DSL at the school and/or a member of the Senior Leadership Team. If no one is available and the child is at immediate risk of serious harm, call the police on 999, then inform Debate Mate's DSL.

Record:

As soon as you hear anything you should make a record of it. This must be done as soon as possible to ensure you don't forget any details. Preferably record what you heard on paper or if needs be it can be electronically (i.e. a 'note' on your phone). **Never email details of a concern to yourself or to anyone else. Make sure you record any exact words the child uses using quotation marks.** This record is to help you to complete the online form as accurately as possible - once you have reported the concern, pass your original notes to the DSL as they direct (for example, by uploading a photo or scan with the report form), then securely delete any copies you hold. Your notes may be needed as evidence if the police become involved.

Report:

You should report immediately and no later than 24 hours. If a child has told you about sexual abuse, or you think a child is at risk of significant harm, tell the school's DSL and phone Debate Mate's DSL or a Deputy straight away. If you are unsure if this is a genuine concern or not, we suggest you always report. This way you have done your bit to safeguard that child. You will never get in trouble for using the safeguarding reporting tool when you have a genuine concern. Under the Crime and Policing Act 2026, it will be a criminal offence for anyone to try to stop a report of child sexual abuse that the law requires. If anyone discourages you from reporting, tell the DSL, a Deputy or the Chair of Trustees.



Debate Mate's Designated Safeguarding Lead will, where possible, update you on the action.