

Violence Prevention SCIO

Safeguarding Children & Adults at Risk Policy

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1. Introduction and Purpose

- Violence Prevention SCIO (“the SCIO”) is a Scottish Charitable Incorporated Organisation providing courses, seminars, networking, teaching and consulting for violence prevention in local communities.
- The SCIO is based in Scotland and operates mainly in Scotland; it also delivers activities in England at times. Where the law differs between jurisdictions, this policy states the requirement for each, and where one jurisdiction is stricter, the SCIO applies the stricter standard across the whole organisation unless stated otherwise.
- This policy is intended to protect children and young people who receive any service from us, including those who are the children of adults who may receive services from us, and to protect adults at risk.
- The SCIO believes that no child, young person or adult at risk should experience abuse or harm, and is committed to their protection.
- This policy provides guidance and overarching principles to those who represent us, to guide our approach to child protection and safeguarding.
- This policy applies to all trustees, staff, managers, volunteers, students or anyone working on behalf of the SCIO. In this policy, all such people are called “representatives”.
- Safeguarding is everyone’s responsibility, not only the Designated Safeguarding Lead’s.

It is not in children’s interests to exaggerate everyday risk. Our aim is that children and adults at risk can take part in safe, positive and rewarding experiences — protected from real harm, not wrapped in risk-aversion to the point of pointlessness.

2. Operational Model and Partner Vetting

Violence Prevention SCIO operates exclusively by networking with high-quality, vetted providers. We do not provide direct supervision of activities as an organisation. Our primary safeguarding duty is therefore to ensure that our partners maintain rigorous safeguarding standards that align with this policy, and that concerns arising at SCIO-connected events reach the right people without delay.

2.1 Due diligence before partnering

Before entering into any partnership or referring participants to a provider, the SCIO verifies, and records evidence of, the following (full checklist at Appendix B):

- The partner holds a written safeguarding policy consistent with the standards in this policy, and names its own safeguarding lead.
- All partner staff and volunteers in regulated roles are members of the Protecting Vulnerable Groups (PVG) scheme in Scotland, or hold an enhanced Disclosure and Barring Service (DBS) check with a children’s barred list check in England. PVG membership has been a legal requirement for regulated roles since 1 April 2025; since 1 July 2025 it is a criminal offence for an organisation to offer a regulated role to a person who is not a member. Coaching children in martial arts is a regulated role. In England, the equivalent requirement is the

enhanced DBS check with barred list check, and people working closely and frequently with children on a supervised basis — including assistant instructors and regular helpers — are now eligible for, and checked at, that level.

- The partner holds current public liability insurance.
- The partner agrees to notify the SCIO's Designated Safeguarding Lead (DSL) of any safeguarding concern, disclosure or allegation arising at, or in connection with, a SCIO-connected event, without delay and no later than the same day.

2.2 Ongoing obligations

- The DSL records every partner notification and acts on it under Sections 14 and 15 of this policy.
- The DSL re-verifies partner vetting at least annually, and immediately upon any concern.
- The SCIO may suspend or end a partnership where safeguarding standards are not met or evidence is not provided.

2.3 Connected organisations

Where a partner is a connected or related organisation — including MartialArts.Scot and Missing Link Martial Arts Ltd — exactly the same vetting, evidence and monitoring requirements apply, with no preferential treatment. Any trustee or representative with an interest in a partner organisation declares it and takes no part in vetting or monitoring decisions about that partner. Safeguarding records, decisions and reporting are kept separately for each organisation.

3. Legal and Regulatory Framework

This policy has been drawn up in accordance with the legislation and guidance applicable in the jurisdictions in which the SCIO operates. Principally:

Scotland

- Children (Scotland) Act 1995 and Children and Young People (Scotland) Act 2014
- National Guidance for Child Protection in Scotland 2021 (updated 2023)
- Protection of Vulnerable Groups (Scotland) Act 2007 and Disclosure (Scotland) Act 2020 — PVG scheme membership is a legal requirement for regulated roles since 1 April 2025; disclosure levels are now Level 1, Level 2, and Level 2 with barred list check
- Adult Support and Protection (Scotland) Act 2007
- Adults with Incapacity (Scotland) Act 2000
- Children (Equal Protection from Assault) (Scotland) Act 2019
- Sexual Offences (Scotland) Act 2009
- United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024

- Limitation (Childhood Abuse) (Scotland) Act 2017 — removed the time bar for civil claims arising from childhood abuse; see Section 19.3 on retention

England (where the SCIO delivers activities)

- Children Act 1989 and Children Act 2004
- Working Together to Safeguard Children 2026 (statutory guidance)
- Safeguarding Vulnerable Groups Act 2006 (as amended) — the DBS regime; enhanced DBS check with children's barred list check for regulated activity
- Crime and Policing Act 2026 — mandatory reporting duty for child sexual abuse (see Section 14); removal of the supervision exemption from regulated activity; removal of the limitation period for child sexual abuse civil claims in England and Wales
- Care Act 2014 (adults at risk, England)

UK-wide and charity regulation

- UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025
- Equality Act 2010
- Health and Safety at Work etc. Act 1974
- Public Interest Disclosure Act 1998 (whistleblowing)
- Charities and Trustee Investment (Scotland) Act 2005 — the SCIO's constitution and OSCR's regulatory framework (see Section 20)

4. Definitions

Child: any person under the age of 18.

Adult at risk: as defined by the Adult Support and Protection (Scotland) Act 2007, a person aged 16 or over who is unable to safeguard their own well-being, property, rights or other interests; is at risk of harm; and — because they are affected by disability, mental disorder, illness or physical or mental infirmity — is more vulnerable to being harmed than persons who are not so affected. All three elements must be present. In England, the equivalent definition under the Care Act 2014 is an adult who has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves.

Safeguarding: the action taken to promote welfare and to protect children and adults at risk from abuse, harm and neglect.

A young person aged 16 or 17 may fall within both definitions. Where either could apply, the SCIO errs on the side of protection and reports the concern; deciding which statutory route applies is the local authority's job, not ours.

5. Principles and Universality of Protection

The SCIO recognises that:

- the welfare of the child is paramount;
- all children, regardless of race, gender, religious belief, disability, age, sexual orientation or identity, have a right to equal protection from harm;
- some children and adults are more vulnerable to harm as a result of their circumstances, prior experiences, communication needs or level of dependency;
- working with children, young people, their parents and/or guardians, carers and other agencies is essential to protecting their wellbeing; and
- safeguarding is everyone's responsibility, at every level of the organisation.

6. Risks to Children and Adults at Risk

While we aim to help children have safe and positive lives — looking for experiences rather than being limited — we recognise they face real situations where they need protection. These risks include, but are not limited to:

- sexual abuse, sexual exploitation and grooming, in person and online;
- physical and emotional abuse, and neglect;
- domestic abuse, including where a child sees, hears or experiences its effects;
- inappropriate supervision and unsafe environments;
- bullying and cyberbullying; child-on-child abuse, including sexual harassment and sexual violence;
- victimisation and discrimination;
- self-harm and mental ill health;
- crime and criminal exploitation;
- radicalisation; and
- online harms, including image-based abuse and AI-generated sexual imagery.

7. Safeguarding Leadership, Roles and Responsibilities

Role	Responsibility
Board of Trustees	Approves this policy; ensures sufficient resources, time and training; receives and reviews the annual safeguarding report; commissions the annual review; considers reporting serious incidents to OSCR (Section 20).
Designated Safeguarding Lead (DSL)	Holds overall operational responsibility for safeguarding. Receives all concerns; decides on and makes referrals to statutory agencies; maintains safeguarding records and the low-level concerns log; oversees partner vetting and representative vetting and training; produces the annual report.
Deputy Designated Safeguarding Lead (Deputy DSL)	Acts with the full authority of the DSL in the DSL's absence, and where the concern relates to the DSL personally.
All representatives	Know this policy and sign the Code of Conduct at Appendix C; maintain the standards in it; report every concern to the DSL or Deputy DSL the same day; never investigate a concern themselves; never promise secrecy.
Parents and carers	Provide accurate contact, medical and consent information and keep it current; raise concerns with the DSL.

7.1 Named post-holders

Post	Details
Designated Safeguarding Lead (DSL)	John McCort, Treasurer
Deputy Designated Safeguarding Lead (Deputy DSL)	Heero Miketta, Charity Manager — 07539 946777

7.2 Independence in a small organisation

The SCIO is a small organisation. Its safeguarding structure is stated plainly because a policy that implies oversight it cannot provide is worse than one that is honest about its limits:

- The DSL is a trustee who is not involved in the SCIO's training ventures. That separation is deliberate: safeguarding decisions are taken by someone independent of the day-to-day delivery work being scrutinised. The DSL is trained in safeguarding and involved as a volunteer in child protection.

- The Deputy DSL is the Charity Manager and is operationally involved in delivery. Concerns about the Deputy DSL therefore go to the DSL; concerns about the DSL go to the Deputy DSL.
- The independent external route is available to everyone without permission from anyone. Anyone — participant, parent, carer, partner, representative or trustee — may contact Police Scotland, the local authority social work department or the NSPCC directly at any time. No internal report, permission or notification is required first. The contacts are at Section 22 and are displayed at every SCIO event.
- Where a concern relates to a safeguarding post-holder and the internal route is conflicted, the external route is the primary one, not the fallback.
- No one is penalised for going outside. Raising a concern externally, in good faith, is expressly protected under Section 18 and can never be treated as disloyalty or as a disciplinary matter.

The Board keeps under review whether to appoint an external safeguarding adviser to provide further independent oversight.

7.3 Post-holders who are also serving police officers

If any trustee or representative of the SCIO is a serving police officer, the following applies:

- The role is held in a personal capacity. The post-holder acts as a representative of the SCIO, not in a policing capacity, and does not represent Police Scotland or any other force when acting for the SCIO.
- Police systems are never used for SCIO purposes. No post-holder may access, or ask a colleague to access, police systems, databases or intelligence to check on any participant, parent, applicant or representative. Accessing police information for a non-policing purpose is a criminal offence under section 170 of the Data Protection Act 2018 as well as a serious disciplinary matter.
- Vetting goes through the proper route only. Suitability is established through the PVG scheme or DBS and the process at Section 8, never through informal police enquiry.
- Reports go through public channels. Where a matter must be reported to the police, it is reported by 999, 101 or a formal referral, so that it enters the system with a reference number and a record. It is not passed informally to a colleague.
- Where a post-holder has any personal or professional involvement in a matter, they step back and the DSL, Deputy DSL or another trustee takes it.
- The post-holder notifies their own force of this voluntary role in line with its business interests or secondary occupation policy, and confirms to the Board that they have done so.

8. Safer Recruitment and Vetting of SCIO Representatives

Criminal record checking is necessary but not sufficient. Every appointment to a SCIO role involving contact with children or adults at risk follows the full process below:

- Role description that states the safeguarding responsibilities of the post.
- Written application or record of appointment, including a full history with any gaps explained.
- Self-declaration of any criminal record, caution, investigation, disciplinary finding or barring in any jurisdiction.
- Verification of identity and of any qualifications claimed.
- At least two references, one of which should be from a previous role involving children where one exists. References are taken up before the person starts.
- Interview or structured conversation covering attitudes to child safety, boundaries and physical contact.
- Criminal record check at the level required for the role and jurisdiction — PVG scheme membership in Scotland, or an enhanced DBS check with children's barred list check in England — obtained and seen before the person begins. It is a criminal offence for the SCIO to offer a regulated role in Scotland to a person who is not a PVG scheme member.
- Induction covering this policy and the Code of Conduct, and a probationary period.

8.1 Duty to refer

Where a person is dismissed, removed from a role, or would have been removed had they not resigned, because they have harmed a child or adult at risk or pose a risk of harm, the SCIO has a legal duty to refer them to Disclosure Scotland (Scotland) or the Disclosure and Barring Service (England and Wales). The referral is made by the DSL with the Board's knowledge, and is made in addition to any referral to the local authority or the police — not instead of it.

9. Training

Safeguarding training is arranged by the SCIO. Completion is recorded against each person in the vetting register. The following minimum standards apply.

Who	What	How often
All representatives	Induction covering this policy, the Code of Conduct, recognising abuse, and how to report	Before first contact with children or adults at risk, then refreshed every 3 years
All the above	Update briefing on any change to this policy or to the law	Within 3 months of the change

10. Code of Conduct for SCIO Representatives

While on SCIO business or attending partner events, all representatives must adhere to the following. Every representative signs the full Code at Appendix C before representing the SCIO, and again at each annual review.

- Representatives must never be alone with a single child out of sight of others, and never supervise a child alone in a changing area or toilet. Photography and filming in changing areas and toilets is prohibited absolutely, and mobile phones are not used in those areas.
- No representative transports a child alone in a vehicle, other than in an emergency. Where an emergency requires it, the DSL is informed the same day and the journey is recorded.
- There must be no personal social-media contact with children; only officially approved channels may be used, with a parent, carer or second adult copied in.
- Photographs or video may only be taken with parental consent, and no full names may be used in captions (Section 11).
- There are to be no gifts or favouritism, and strictly no alcohol, tobacco, vapes or similar substances when responsible for children.
- Corporal punishment is prohibited absolutely, in any form, in any SCIO setting. Physical punishment of children is unlawful in Scotland under the Children (Equal Protection from Assault) (Scotland) Act 2019. Physical restraint may be used only where necessary to prevent injury to a person or serious damage to property, to the minimum degree and for the minimum time necessary, and every instance is recorded and reported to the DSL the same day, and the parent or carer is informed.
- Positions of trust: no representative aged 18 or over may enter into a sexual or romantic relationship with any participant under the age of 18, regardless of the age of consent. Breach is gross misconduct and will result in dismissal from the SCIO and referral to Disclosure Scotland or the DBS. In England, sexual activity by a sports coach with a 16 or 17 year old in their care is also a criminal offence under the Sexual Offences Act 2003, as amended by the Police, Crime, Sentencing and Courts Act 2022.
- Any representative who is or becomes aware of a personal relationship or other circumstance that could give rise to a conflict of interest — including a pre-existing family relationship with a participant — must declare it to the DSL.
- Representatives must report any arrest, caution, charge, conviction, civil injunction, domestic abuse allegation, or any change to their PVG or DBS status, to the DSL within 24 hours.

10.1 Physical contact at partner events

SCIO representatives do not deliver training and do not use physical contact in instruction. Where a representative takes part in a partner activity as a participant, the partner's rules apply together with the following SCIO rules: contact is explained before it is used; any indication that a person wants contact to stop — verbal, a tap, or physical withdrawal — is respected immediately; and responsibility for staying within appropriate limits rests entirely with the adult.

11. Photography, Filming and Images

- Photographs or video of children may only be taken with parental or carer consent.
- Full names are never published alongside an image of a child — first name only, or no name. Personal contact details are never published with an image.
- Images are not published in a way that reveals the location or timing of a specific child's regular attendance.
- Any parent, carer or participant may withdraw permission at any time by telling the DSL. No reason has to be given. The objection is recorded, the person does not appear in published material from that point, and existing images are removed from the SCIO's own channels on request. Withdrawing permission has no effect on the ability to take part. The SCIO cannot recall material already shared onward by third parties, and says so when consent is taken.

11.1 Children who must not be photographed

There will occasionally be a child whose image must not be captured or published at all — for example a child living in a refuge, a looked-after child, a child subject to a court order, or a child at risk from a person who must not learn their whereabouts. Parents and carers may notify the DSL confidentially. Where notified, the DSL records the restriction and informs the representatives and partners involved, without disclosing the reason, and arrangements are made so that the child can take part fully while remaining out of shot. This route is available at all times and is signposted on SCIO materials.

12. Online Safety and Communications

- Communication with participants under 18 takes place through SCIO-approved channels only, and copies a parent, carer or second adult.
- No representative contacts a participant under 18 through a personal social media account, personal phone number or private direct message, or accepts a friend or follow request from one.
- Online sessions are delivered from an appropriate setting, with a second adult or the parent present, and are not recorded without consent.
- Representatives report to the DSL any online content or contact involving a participant that causes them concern, including sexual imagery, AI-generated or manipulated images, and contact from unknown adults.
- Concerns about a nude or semi-nude image of a child being shared are reported to the DSL and, where appropriate, to the police. Representatives do not view, copy, forward or store the image.

13. Managing Disclosures

If a child or adult at risk makes a disclosure to any SCIO representative, at any event or in any setting, the representative must:

- **Receive.** Listen carefully and calmly. Reassure the person that they were right to speak up. Ask the minimum number of open questions needed to understand whether there is a concern. Never ask leading questions and never investigate.
- **Do not promise secrecy.** Explain, in age-appropriate terms, that you may have to tell someone in order to get them help, and that you will tell them who you are telling.
- **Record.** As soon as possible and the same day: the facts, the person's own words in quotation marks, times, dates, who was present, and anything observed such as injuries. Record what was said, not your interpretation. Sign and date the record. The form at Appendix E must be used.
- **Report.** Hand the record to the DSL or Deputy DSL the same day. If neither is available and a child or adult at risk is at immediate risk, call 999 or the local authority yourself — do not wait.
- **Support.** Check on your own wellbeing. Receiving a disclosure is difficult, and support is available from the DSL.

14. DSL Decisions and Referrals

Situation	Action
Child or adult at immediate risk	Call 999 immediately. Notify the local authority social work department the same day.
Child at risk of significant harm	Referral to the local authority children's social care / children and families social work team the same day, confirmed in writing within 24 hours. In Edinburgh: 0131 200 2327.
Adult at risk of harm	Referral to the local authority adult protection route. In Edinburgh: Social Care Direct, 0131 200 2324. Out of hours: Emergency Social Work Service, 0800 731 6969. In England: the adult social care safeguarding team at the relevant local authority.
Child in need of additional support	Discuss with the local authority; seek parental agreement where safe to do so.
Uncertain, non-recent or low-level	Seek advice from the NSPCC Helpline (0808 800 5000); record the concern and the advice given; review.

- The DSL informs the parent or carer unless doing so may place the child at further risk, alert an alleged perpetrator, or interfere with a police investigation. The decision and the reason are recorded.
- If a referral is made and nothing appears to happen, the DSL escalates — to the team manager, then to the local Child Protection Committee (Scotland) or safeguarding partnership (England). The SCIO does not assume that silence means the concern was unfounded.
- Scotland has no LADO (Local Authority Designated Officer). Concerns and allegations about a person in a position of trust go to the local authority child protection team via the numbers at Section 22. In England, allegations against a person who works with children go to the LADO at the relevant local authority, within one working day, before any other action is taken.
- Referral to the Scottish Children's Reporter Administration is considered at all stages where compulsory measures of care may be needed.

14.1 Mandatory reporting of child sexual abuse (England)

The Crime and Policing Act 2026 introduces a statutory duty to report child sexual abuse. It applies to anyone in regulated activity with children in England. Where the SCIO delivers activities in England, representatives engaged in regulated activity there are bound by this duty. The duty is engaged where a person is told by a child that they are being sexually abused, is told by a person that they have sexually abused a child, or witnesses a child being sexually abused. Where it is engaged, a report must be made to the police or the local authority as soon as reasonably practicable; a representative discharges the duty by reporting to the DSL, provided the DSL then makes the notification and confirms back to the reporter that it has been made.

The duty does not apply in Scotland, but the SCIO applies the same reporting standard there as a matter of policy. No representative, at any level, may discourage, delay or obstruct a report, and concern for the SCIO's reputation is never a reason to withhold one. It is a criminal offence in England, punishable by up to seven years' imprisonment, to act with the intention of preventing a report being made under this duty.

15. Allegations Against Representatives and Low-Level Concerns

15.1 Allegations against representatives

This section applies where it is alleged that a trustee, representative or volunteer has harmed a child or adult at risk, committed a criminal offence against them, behaved towards them in a way that indicates they may pose a risk, or behaved in a way that indicates they may be unsuitable to work with them.

- The allegation is reported immediately to the DSL. Where the allegation concerns the DSL, it is reported to the Deputy DSL; where it concerns the Deputy DSL, it is reported to the DSL. In either case the receiving post-holder contacts the local authority child protection team (Scotland) or the LADO (England) directly and does not inform the person concerned first (Section 7.1).

- The DSL informs the Board of Trustees and contacts the local authority child protection team or LADO before taking any other action, including speaking to the person accused.
- Immediate suspension of the representative's duties is considered where there is a continuing risk, a risk of interference with evidence or witnesses, or the allegation is so serious that it warrants it. Suspension is a neutral act and is not a disciplinary sanction.
- The SCIO follows the local authority or LADO process and its own disciplinary procedure, and keeps a written chronology throughout.
- The person accused is kept informed as far as is consistent with the investigation, and is told where to find support.
- The outcome is recorded as unfounded, unsubstantiated, malicious, or substantiated. Disciplinary sanctions can include dismissal from the SCIO.
- Where the outcome meets the threshold, the SCIO makes a referral to Disclosure Scotland or the DBS under Section 8.1. This duty applies even if the person has resigned.

15.2 Low-level concerns

A low-level concern is any behaviour by a SCIO representative or partner that is inconsistent with the Code of Conduct at Appendix C but does not meet the threshold for an allegation. Examples include being over-familiar, using inappropriate language, or repeatedly finding reasons to be alone with a particular child.

- Low-level concerns are reported to the DSL and recorded on the low-level concerns log (Appendix D), with dates, and are shared with the person concerned unless doing so would compromise a wider investigation.
- The DSL reviews the log at least every 4 weeks.
- Where a pattern emerges, the DSL escalates to the local authority child protection team (Scotland) or LADO (England) and considers whether a Disclosure Scotland or DBS referral is required.
- The log is retained until 7 years after the person leaves the SCIO. Where a concern has been escalated, it is retained in line with Section 19.

Recording a low-level concern is not an accusation. The purpose is to allow patterns to be seen that no single incident would reveal.

16. Adults at Risk

The SCIO works with adults as well as children, and some adult participants may be adults at risk within the definition at Section 4.

The same reporting route applies as for children: concerns go to the DSL or Deputy DSL the same day, and the DSL decides on referral. In Scotland, referrals are made to the local authority adult protection route under the Adult Support and Protection (Scotland) Act 2007 — in Edinburgh, Social Care Direct on 0131 200 2324 (out of hours: Emergency Social Work Service, 0800 731 6969). In

England, referrals are made to the adult social care safeguarding team at the relevant local authority under section 42 of the Care Act 2014.

The SCIO recognises that an adult's right to make their own decisions must be respected, consistent with the principles of the Adults with Incapacity (Scotland) Act 2000 and the Mental Capacity Act 2005 (England). Where an adult at risk has capacity and does not wish a referral to be made, the DSL will normally respect that, unless others are at risk, a criminal offence has been committed, or the person lacks capacity to make that decision. The reasoning is recorded either way.

The Ann Craft Trust provides specialist guidance on safeguarding adults at risk in sport and activity settings, and the DSL may seek advice from them.

17. Bullying and Child-on-Child Abuse

The SCIO does not tolerate bullying of children, whether by adults or by other children. Children can and do abuse other children — inside and outside organised activities and online — and it must never be dismissed as banter, horseplay, or part of growing up. Child-on-child abuse includes bullying and cyberbullying, physical abuse, sexual harassment, sexual violence, sharing of nude or semi-nude images, initiation or hazing rituals, and abuse within young people's intimate relationships.

Where an incident of child-on-child bullying or abuse arises at, or in connection with, a SCIO event:

- Those involved are separated immediately and made safe.
- The incident is recorded in writing and reported to the DSL the same day.
- The DSL assesses the incident, including whether it meets the threshold for referral to the local authority or the police under Section 14, and whether the mandatory reporting duty in Section 14.1 is engaged for activity in England.
- The parents or carers of all children involved are informed, unless doing so would place a child at further risk.
- Support is offered to the child who has been harmed, and an appropriate response is decided for the child who caused harm.
- The DSL reviews the incident, records the outcome, and considers whether any pattern is emerging.

Where the incident arises within a partner's activity, the partner is informed the same day and is expected to act under its own safeguarding policy; the SCIO records the incident and the partner's response. The SCIO does not hand incidents of child-on-child abuse to parents to resolve between themselves.

18. Whistleblowing

Anyone who believes that a child or adult at risk is at risk, or that the SCIO is failing to act on a safeguarding concern, is expected to say so. Concerns may be raised with the DSL, with the Deputy DSL, with any trustee, or externally.

- Concerns may be raised externally at any time — including with the NSPCC whistleblowing advice line (0800 028 0285), the local authority, the police, or OSCR via its concerns form. Nobody is required to exhaust internal routes first.
- The Board acknowledges any internal whistleblowing report within 7 days and provides an outcome within 28 days.
- Victimising or penalising anyone who raises a concern in good faith is gross misconduct. Protection under the Public Interest Disclosure Act 1998 applies.

19. Records, Data Protection and Retention

19.1 Lawful basis

Data	Basis
General personal data	UK GDPR Article 6(1)(f), legitimate interests — protecting children and adults at risk; Article 6(1)(d), vital interests, where there is a risk to life.
Special category data (including health and safeguarding records)	UK GDPR Article 9(2)(g), substantial public interest, with the condition at paragraph 18 of Part 2 of Schedule 1 to the Data Protection Act 2018 — safeguarding of children and individuals at risk.
Criminal offence data (PVG or DBS information, safeguarding allegations)	Schedule 1 of the Data Protection Act 2018 — safeguarding, and prevention or detection of unlawful acts.

Relying on the paragraph 18 safeguarding condition requires the SCIO to keep an Appropriate Policy Document. This is maintained by the DSL, reviewed alongside this policy, and made available to the Information Commissioner on request. The SCIO maintains a separate Data Protection Policy, which includes the Appropriate Policy Document and the full retention schedule.

19.2 Storage and access

- Safeguarding records are kept separately from general SCIO records.
- Electronic records are encrypted (e.g., OneDrive, Proton Drive) and access is restricted to the DSL and Deputy DSL. Paper records are kept locked.
- Information is shared on a need-to-know basis. Data protection law is not a barrier to sharing information in order to keep a child or adult at risk safe, and concern about data protection is never a reason to delay a safeguarding referral.

19.3 Retention

The Limitation (Childhood Abuse) (Scotland) Act 2017 removed the time bar for civil claims arising from childhood abuse in Scotland, and the Crime and Policing Act 2026 removed the equivalent limitation period in England and Wales. Claims may be brought at any point in a person's life, and

the SCIO must be able to evidence what it knew and what it did. Retention periods are set accordingly.

Record type	Retention
Child protection records, allegations against representatives, and any record of a safeguarding concern about a child	Retained for 75 years from the date of the record. Not destroyed at the child's 25th birthday.
Low-level concerns log	7 years after the person leaves, or in line with the row above where escalated.
Vetting records (PVG or DBS certificate numbers, dates, decisions)	Duration of engagement plus 7 years. Certificates themselves are not retained beyond 6 months.
Incident and accident records	25 years from the date of the incident where the person was a child.

19.4 Subject access requests

Subject access requests are handled within one month. Third-party data is redacted. Where disclosing information would be likely to cause serious harm, or would prejudice the prevention or detection of crime, the relevant exemption is applied and the reasoning recorded. The DSL takes advice before releasing any safeguarding record.

20. OSCR and Charity Governance

The SCIO's trustees have legal duties under the Charities and Trustee Investment (Scotland) Act 2005 to act in the best interests of the charity and to ensure appropriate safeguarding policies, procedures and practices are in place, regularly reviewed, and applied in practice.

- The DSL's annual safeguarding report (Section 21) supports the Board's oversight and the SCIO's annual return to OSCR.
- Where a serious safeguarding incident occurs — for example an incident of abuse or mistreatment of a vulnerable beneficiary, or an investigation by a statutory authority — the Board considers reporting it to OSCR. Since April 2024, OSCR receives such reports through its online concerns form, which replaced the former notifiable events regime.
- Safeguarding governance, records and reporting for the SCIO are kept distinct from those of any connected organisation, including MartialArts.Scot and Missing Link Martial Arts Ltd. Information is shared between organisations only where lawful and necessary to keep a child or adult at risk safe.

21. Monitoring, Review and Assurance

- The DSL produces an annual safeguarding report for the Board every September, covering concerns raised and their outcomes, training completed, the vetting status of all representatives and partners, and any policy gaps identified. The report is produced whether or not any incident has occurred; a nil return is recorded as such.
- This policy is reviewed every 12 months, in September.
- It is also reviewed sooner following: any serious incident; any change in legislation or statutory guidance; any allegation against a representative; or feedback from a local authority, the Care Inspectorate, or OSCR.
- The current version is issued to all representatives, who confirm they have read it, and is available to partners, parents and carers on request.

22. Key Contacts

Verified September 2026. Re-checked at each annual review. These contacts are displayed at every SCIO event.

Contact	Number	When
Emergency services	999	Child or adult in immediate danger
Police Scotland non-emergency	101	Report a matter not needing an emergency response
City of Edinburgh Council — Children and Families Social Work	0131 200 2327	Child protection referral, same day
City of Edinburgh Council — Social Care Direct	0131 200 2324	Adult protection and general social care; office hours
Emergency Social Work Service (out of hours)	0800 731 6969	Children and adults, evenings, weekends and holidays
Scottish Children's Reporter Administration	0131 244 8701	Where compulsory measures of care may be needed
NSPCC Helpline	0808 800 5000	Advice where a concern is uncertain or non-recent
NSPCC whistleblowing advice line	0800 028 0285	Where the SCIO is not acting on a concern
Childline	0800 1111	For children and young people
Scotland's Domestic Abuse and Forced Marriage Helpline	0800 027 1234	Domestic abuse and forced marriage, 24 hours

Contact	Number	When
Rape Crisis Scotland	08088 01 03 02	Sexual violence support

Where the SCIO delivers activities in England, the DSL identifies the relevant local authority children's social care, adult safeguarding and LADO contacts for the area before the activity runs, and adds them to the event's displayed contacts.

23. Approval and Version Control

Item	Detail
Version	2.1
Date	September 2026
Next review	September 2027, or sooner under Section 21
Policy owner	Designated Safeguarding Lead, John McCort

This policy is approved and endorsed by the Board of Trustees of Violence Prevention SCIO.

Appendix A — Reporting Procedure at a Glance

Step	What happens
1. Receive	Listen. Reassure. Do not promise secrecy. Do not investigate. Do not ask leading questions.
2. Record	Same day, using the form at Appendix E. Facts, exact words, times, witnesses, anything observed. Sign and date.
3. Report	To the DSL or Deputy DSL the same day. If a child or adult at risk is in immediate danger and neither is reachable, call 999 yourself.
4. Refer	The DSL decides and refers — see Section 14. The DSL confirms back to the reporter what has been done.
5. Review	The DSL records the outcome, monitors the situation, and reviews whether further action is needed.

If in doubt, report it. It is not your job to decide whether abuse has happened. It is your job to pass on the concern.

Appendix B— Code of Conduct

Every trustee, representative and volunteer signs this Code before representing the SCIO in any setting involving children or adults at risk, and again at each annual review.

I will

1. treat every child and adult at risk with respect, and provide an example I would wish others to follow;
2. report every safeguarding concern to the DSL or Deputy DSL the same day, however small it seems;
3. explain physical contact before it is used in any activity I take part in, and stop immediately if asked;
4. keep contact with participants under 18 to SCIO-approved channels, with a parent, carer or second adult copied in;
5. record any disclosure or incident using the form at Appendix E and hand it to the DSL or Deputy DSL the same day;
6. challenge poor practice by colleagues and partners, at any level of seniority, and report it if it does not stop;
7. declare to the DSL any personal relationship or circumstance that could give rise to a conflict of interest;
8. report to the DSL within 24 hours any arrest, caution, charge, conviction, civil injunction, or allegation made against me in any setting, and any change to my PVG or DBS status.

I will not

9. use corporal punishment, or use physical restraint or any physical technique as a punishment;
10. be alone with a single child out of sight of others, or supervise a child alone in a changing area or toilet;
11. transport a child alone in a vehicle other than in an emergency;
12. contact a participant under 18 through a personal social media account, personal number or private message, or accept a friend or follow request from one;
13. enter into a sexual or romantic relationship with any participant under 18;
14. photograph or film in changing areas or toilets, photograph or film without consent, or publish an identifying image of anyone who has withdrawn permission;
15. give gifts to individual children, show favouritism, or develop a relationship with a particular child that could be seen as preferential;
16. consume alcohol or be under the influence of alcohol or drugs when responsible for children, or use tobacco or vapes in their presence;
17. promise secrecy to a child, or investigate a concern myself;
18. discourage, delay or obstruct anyone from making a safeguarding report.

Appendix C — Low-Level Concerns Log

This log is used to record any behaviour that is inconsistent with the Code of Conduct, even if it is not explicitly illegal. The Designated Safeguarding Lead (DSL) must review this log every 4 weeks. If a pattern emerges, the DSL will escalate the matter to the local authority child protection team (Scotland) or LADO (England), or to Disclosure Scotland / the DBS. Copies of these records must be retained until 7 years after the representative leaves; where a concern has been escalated, Section 19 applies.

Date Reported	Name of Representative	Details of Concern	Reported By	DSL Review Date	Action Taken / Escalated?
[DD/MM/YYYY]	[Name]	[Factual description of the behaviour]	[Name]	[DD/MM/YYYY]	[e.g., Monitored, Warning given, Escalated]

Appendix E — Safeguarding Incident Reporting Form

This form must be completed immediately following a disclosure or observed incident. The reporter must record facts, quotes, times, witnesses, and any physical injuries observed. Once completed, this form must be handed directly to the DSL or Deputy DSL.

Section	Details to Provide
Date and Time of Incident	[DD/MM/YYYY] at [HH:MM]
Name of Child / Adult at Risk	[Full Name]
Name of Reporter	[Your Name and Role]
Location of Incident	[Event Name / Partner Venue]
Witnesses	[Names of anyone else present during the incident or disclosure]
Factual Description	[Describe exactly what happened. State facts only, not personal opinions.]
Exact Quotes	[Record the exact words used by the child or adult at risk.]
Injuries Observed	[Describe any physical injuries visible. Do not physically examine the person.]
DSL ONLY: Action Taken	[] 999 Called (Immediate Danger) [] Social Work Referral Made [] Advice sought from NSPCC
DSL Signature & Date	[Signature] — [DD/MM/YYYY]

Important Data Protection Note: Electronic files containing these completed forms must be encrypted (e.g., on OneDrive or Proton Drive), and access must be strictly restricted to the DSL and Deputy DSL.