

SAFEGUARDING POLICY

Children and young people

Switch Rugby Ltd (trading as Switch Rugby and Switch Mentoring)

Date of this version	Review cycle	Reviewed / approved by	Next review date
10/03/2023	Annual	Matt Sheppard	10/03/2024
10/03/2024	Annual	Matt Sheppard	10/03/2025
10/03/2025	Annual	Matt Sheppard	10/03/2026
01/09/2025	Annual	Matt Sheppard	01/09/2026
01/09/2026	Annual	Matt Sheppard	01/09/2027

1. PURPOSE AND SCOPE

Switch Rugby Ltd (trading as Switch Rugby and Switch Mentoring) ('Switch') is a company registered in England, registered office 18 Chelmer Grove, Keynsham, Bristol BS31 1QA. Its Director is Matt Sheppard, who is also the Designated Safeguarding Lead (DSL).

- 1.1** This policy applies to every employee, and anyone else who works with children on Switch's behalf (for example a student on placement), who is checked to the same standard, in either trading name. It covers rugby coaching in schools and clubs, holiday camps, the City of Bristol U16 programme and all Switch Mentoring work, wherever it takes place.
- 1.2** Switch is not a school. Keeping Children Safe in Education 2026 (KCSIE) is statutory for the schools we work with, and those schools must be satisfied that any organisation working with their pupils applies equivalent checks and procedures. Switch therefore applies KCSIE 2026 as if it were a school. Where this policy says less than KCSIE, KCSIE applies.
- 1.3** The welfare of the child is paramount. Every child has the same right to be protected from harm; some are more vulnerable because of their circumstances; and safeguarding is everyone's responsibility, not the DSL's alone.
- 1.4** The words "child" and "young person" mean anyone under 18. "Mentee" means a young person referred to Switch Mentoring. "School DSL" means the designated safeguarding lead (or deputy) of the school that commissioned the work or that the child attends.

2. KEY CONTACTS

Role	Who	Contact
Designated Safeguarding Lead (DSL) and Director	Matt Sheppard	matt@switchrugby.com — 0117 233 7513
Deputy DSL (Administrator and Youth Mentor)	Louise Maynard	admin@switchrugby.com
Head of Rugby	Gary Townsend	gary@switchrugby.com

Local authority contacts, verified September 2026:

Area	Children's social care (daytime)	LADO
Bristol	First Response 0117 903 6444	0117 903 7795 — LADO@bristol.gov.uk

Area	Children's social care (daytime)	LADO
Bath and North East Somerset	01225 396312 or 01225 396313	01225 396810 — LADO@bathnes.gov.uk
South Gloucestershire	Access and Response Team 01454 866000	01454 868508 — LADO@southglos.gov.uk
North Somerset	Care Connect 01275 888 808	07795 092692 (to verify) — LADO@n-somerset.gov.uk
Out of hours (all four authorities)	Emergency Duty Team 01454 615165	Emergency: 999

Other	Contact
Police	999 in an emergency; 101 otherwise
NSPCC helpline (advice for adults worried about a child)	0808 800 5000 — help@nspcc.org.uk
NSPCC whistleblowing advice line	0800 028 0285
Childline (for children)	0800 1111

3. LEGAL AND GUIDANCE FRAMEWORK

This policy is written to comply with, and should be read alongside:

- Children Act 1989 and Children Act 2004
- Working Together to Safeguard Children 2023 (HM Government)
- Keeping Children Safe in Education 2026 (DfE), applied as set out in 1.2
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)
- Prevent duty guidance 2023 and the Counter-Terrorism and Security Act 2015
- Sexual Offences Act 2003, including sections 16 to 19 and 22A (abuse of a position of trust, including by sports coaches)
- Safeguarding Vulnerable Groups Act 2006, Protection of Freedoms Act 2012 and Crime and Policing Act 2026 (regulated activity and DBS)
- Female Genital Mutilation Act 2003, as amended by the Serious Crime Act 2015 (mandatory reporting duty)
- Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025
- Children and Families Act 2014 and the SEND Code of Practice 2015
- Equality Act 2010 and Human Rights Act 1998
- UN Convention on the Rights of the Child 1989

Related Switch documents: LADO Procedures; Safer Recruitment Policy; Behaviour Code for Adults; Behaviour Code for Children and Young People; RSHE Policy; Whistleblowing Policy; Data Protection and Data Security Policy; Vehicle Risk Assessment; Off-Site Venue Risk Assessment; Child Protection Incident Record; Low-Level Concern Record.

4. ROLES AND RESPONSIBILITIES

Director and Designated Safeguarding Lead

- 4.1** Matt Sheppard, Director, is the DSL and has lead responsibility for safeguarding across Switch. The DSL:
- takes the lead on all safeguarding concerns and decides, with the school DSL, whether and where to refer;
 - liaises with school DSLs, children's social care, the police, the LADO and other agencies;
 - keeps the child protection records described in section 13;
 - makes sure every member of staff is trained and knows this policy;
 - acts as case manager for allegations against staff under the LADO Procedures, unless the allegation concerns him.
- 4.2** The DSL holds DSL training refreshed at least every two years, and Prevent awareness training. The current refresher is booked for autumn 2026.

Deputy DSL and cover

- 4.3** Louise Maynard, Administrator and Youth Mentor, is Deputy DSL. She will complete DSL training by 31 December 2026 and refresh it at least every two years. Until then she consults the DSL, or the school DSL or children's social care, on any referral decision.
- 4.4** The DSL or Deputy is contactable whenever Switch staff are working with children. If the DSL is unavailable, contact the Deputy DSL by phone or at admin@switchrugby.com. If neither can be reached and a child may be at risk, contact the school DSL and, failing that, children's social care direct (section 2). Waiting for the DSL is never a reason to delay.

Head of Rugby

- 4.5** Gary Townsend, Head of Rugby, makes sure this policy is followed at every rugby session, camp and City of Bristol U16 activity: ratios, registration and collection, changing rooms, images, and that every coach knows how to report a concern. He reports concerns to the DSL like any other member of staff.

Every member of staff

- 4.6** Everyone who works for Switch must:
- read and follow this policy, the Behaviour Code for Adults and KCSIE 2026 Part one;
 - know who the school DSL is at every school they work in, before the first session;
 - report every concern the same day (section 7) and record it on the Child Protection Incident Record;
 - report any concern about the conduct of an adult, including themselves (section 11);
 - keep training in date and tell the DSL at once of anything that could affect their suitability to work with children.

Training

- 4.7** Training requirements are:

Who	What	When
All staff	Safeguarding and child protection training	At induction, before working with children; refreshed at least annually

Who	What	When
All staff	Read KCSIE 2026 Part one and sign to confirm	At induction and every September when the new edition takes effect
All staff	Prevent awareness	Completed at induction and refreshed with safeguarding training
All staff	Behaviour Code for Adults, this policy, LADO Procedures and Whistleblowing Policy read and signed	At induction and on each reissue
DSL and Deputy DSL	DSL training	At least every two years (Deputy's first course by 31 December 2026)

The DSL keeps a record of all training on the central record described in the Safer Recruitment Policy.

5. HOW SWITCH WORKS AND WHERE THE RISKS ARE

- 5.1** Most of our work is one adult with one young person, away from other adults. That is the point of mentoring and it is also the risk. Everything here is planned, consented to and logged; how, where and when a session happens is never left to one member of staff to decide alone.

Mentoring: the four delivery models

- 5.2** Mentoring is commissioned by a school under the Mentoring Service Level Agreement 2026-27. Before the first session every mentee has a completed Mentee Referral Form with parental consent, the school DSL's contact details and the information in 14.2. Sessions are normally two hours (one to three). There is no online or virtual mentoring.
- 5.2.1 On-site 1-to-1.** In a room agreed with the school, visible from outside where possible (window or open door), under the school's own procedures.
- 5.2.2 Off-site 1-to-1.** The mentor collects the mentee from school, drives them in their own vehicle to an agreed public venue (sports centre, climbing wall, café, park, museum) and returns them to school or home as agreed with the school.
- 5.2.3 Off-site with a non-attender collected from home.** As 5.2.2, but the mentee is collected from and returned to the family home. Section 5.5 applies.
- 5.2.4 Paired and small-group sessions.** Two mentees with one mentor, or a small group (mostly primary age) on a school site. Pairings are agreed with the school in advance.

Rugby coaching, camps and the City of Bristol U16 programme

- 5.3** Coaching in schools and clubs takes place under the host's procedures with the coach in view of other adults. At holiday camps and the City of Bristol U16 programme, which Switch runs:
- every child is registered by a parent or carer with contact details, medical information and consent, signed in and out, and released only to a named adult;
 - coaches work in sight of one another; a coach is alone with a child out of view only to give first aid, with the door open and another adult told;
 - adults enter changing rooms only when necessary, announced and, wherever possible, with another adult; never alone with one child; no phones or cameras in changing areas;
 - we do not run provision for children under eight.

Lone working

5.4 Lone 1-to-1 work is our planned way of working, not an exception. The compensating controls are:

- the school and parent have consented to the specific arrangement (venue type, transport, collection) through the Mentee Referral Form and SLA;
- the plan for each off-site session (mentee, collection point, venue, expected return time) is recorded in the mentoring timetable and the mentee's folder so the DSL or Deputy can see it;
- the mentor messages the Switch staff group chat in Google Chat (part of the Switch Google Workspace, never WhatsApp or SMS) on collection and on safe return; the DSL or Deputy chases if no return message has arrived 30 minutes after the expected return time;
- the Session Log, sent to the school after every session, records times, venue, journey and anything of note;
- sessions take place only in public venues risk-assessed under the Off-Site Venue Risk Assessment, on school premises, or in the vehicle in transit; never in any private home;
- no unplanned or unlogged time with a mentee; no lifts, meetings, gifts or contact outside a scheduled session;
- a mentor in a situation that could be misunderstood tells the DSL the same day (11.6).

Transport

5.5 Mentors transport mentees in their own vehicles under the Vehicle Risk Assessment (driver, vehicle and insurance checks). The safeguarding rules are:

- parental consent for transport is in place before the first journey;
- secondary-age mentees may sit in the front passenger seat (seat fully back, airbag active, seatbelt on) because conversation is the purpose of the session; primary-age mentees sit in the rear on a high-backed booster seat provided by Switch. By law a child under 12 who is under 135 cm tall must use an appropriate child car seat or booster; children aged 12 or over, or over 135 cm, must wear a seatbelt. A secondary-age mentee who is under 12 and under 135 cm (possible in Year 7) therefore sits in the rear on a booster seat. Requiring every primary-age mentee to use a booster seat is a Switch rule that goes beyond the law;
- child locks off (unless the Mentee Referral Form records a specific risk of the mentee leaving a moving vehicle; see the Vehicle Risk Assessment); no passengers other than the mentee (or the second mentee in an agreed paired session); sat-nav set before moving; no detours or unplanned stops;
- no video recording in mentoring, including in vehicles;
- if a mentee refuses to get into or out of the vehicle, or leaves it, the mentor does not use force, keeps sight of the mentee where safe, and phones the school and DSL at once; if the mentee cannot be located, call the police on 101, or 999 if there is immediate risk.

Home collection

5.6 Where a mentee is collected from home:

- collection and return are at the doorstep only; the mentor never enters the home, whatever the invitation or weather;
- the mentor must speak to a parent, carer or other responsible adult at either collection or return on every session;
- arrangements for the day often come from the school and mentors are expected to be flexible: a change of collection time or place from the school is confirmed with the school before the

mentor acts on it and recorded in the Session Log; a change of venue or route by the mentor is agreed with the DSL or Deputy first and recorded in the Session Log;

- if no adult can be engaged at either end, the mentor confirms the mentee is safely inside, tells the school the same day and records it in the Session Log;
- a mentee under 12, or one whose Mentee Referral Form says they must not be left alone, is never left at a home without an adult. The mentor waits with the mentee, phones the parent or carer, then the school; on the school's instruction returns the mentee to school or to another adult the school names; and if the school cannot be reached, phones the Switch DSL, who decides with the school DSL, which may include contacting children's social care.

Venues

- 5.7 Off-site venues are covered by the Off-Site Venue Risk Assessment and a one-page per-venue sheet. Venues are public, staffed and suitable for the mentee's age and needs; mentors do not accompany mentees into toilets or changing areas, and do not use venues whose main business is alcohol.

Contextual and extra-familial harm

- 5.8 Many mentees are at heightened risk of harm outside the family: criminal exploitation and county lines, sexual exploitation, serious violence and knife carrying, and online harm. Mentors often hear things a school does not. Staff record and pass to the school DSL any contextual information (names, places, vehicles, online activity, changes in money, possessions or mood) so that the school and children's social care can take a contextual approach. Staff never investigate or challenge suspected exploiters.

6. RECOGNISING ABUSE AND NEGLECT

- 6.1 Abuse is a form of maltreatment: inflicting harm, or failing to act to prevent harm. Children may be abused at home, in an institution or in the community, by adults or by other children, online and offline.
- 6.2 Working Together 2023 defines four categories:
- **Physical abuse:** hitting, shaking, throwing, poisoning, suffocating or otherwise causing physical harm, including fabricating or inducing illness.
 - **Emotional abuse:** persistent emotional maltreatment: conveying that a child is worthless or unloved, silencing them, age-inappropriate expectations, seeing or hearing the ill-treatment of another, serious bullying, exploitation or corruption.
 - **Sexual abuse:** forcing or enticing a child to take part in sexual activities, whether or not they are aware of what is happening, including non-contact activity such as producing or looking at sexual images and grooming, including online. Women and other children can commit sexual abuse.
 - **Neglect:** persistent failure to meet a child's basic physical or psychological needs: food, clothing, shelter, supervision, medical care, or response to basic emotional needs.
- 6.3 Indicators that should make staff stop and think: unexplained or repeated injuries, or explanations that do not fit; a child who is hungry, unwashed, wrongly dressed for the weather or exhausted; sudden changes in behaviour, mood, attendance or friendships; fear of going home or of a particular person; sexualised language or behaviour beyond the child's age; unexplained money, phones or possessions; missing episodes or being collected by unknown adults; secretive phone use; and anything a child says, however indirectly, that suggests harm.

Specific safeguarding issues (KCSIE 2026 Part one and Annex A)

- 6.4 Child-on-child abuse (including harassment and violence).** Children can and do abuse other children: bullying (including online), physical abuse, sexual violence and harassment, harmful sexual behaviour, misogynistic and discriminatory behaviour, initiation or hazing, upskirting, and the consensual and non-consensual making or sharing of nudes and semi-nudes. It can happen in a paired session, a camp group or a squad, or between a mentee and children elsewhere. Staff treat it as a safeguarding matter for both children, never as "banter", and report it under section 7 (see 9.5).
- 6.5 Nudes and semi-nudes.** Staff must never view, copy, forward or save such an image, ask a child to send it, or search a device. Report immediately to the school DSL and Switch DSL, who follow UKCIS guidance. This includes images wholly or partly generated or altered by AI.
- 6.6 Child criminal exploitation (CCE), child sexual exploitation (CSE) and county lines.** Exploitation is where an individual or group uses an imbalance of power to coerce, manipulate or deceive a child into activity, in exchange for something the child needs or wants, for the perpetrator's gain, or through violence or its threat. A child may believe they are consenting; they are not. Indicators: going missing, unexplained money or gifts, new older "friends", travel to unfamiliar areas, carrying weapons or drugs, injuries, relationships with a marked age gap.
- 6.7 Serious violence.** Signs include increased absence, new older or gang-linked friends, a decline in performance, self-harm, unexplained injuries and new possessions. Mentors record what they see and hear and share it with the school DSL.
- 6.8 Mental health.** Mental health problems can indicate that a child has suffered or is at risk of abuse, neglect or exploitation. Mentors do not diagnose. Where a child talks about self-harm or suicide, the mentor takes it seriously, does not promise secrecy, stays with the child, calls 999 if there is immediate risk, and reports the same day.
- 6.9 Domestic abuse.** Children who see, hear or experience domestic abuse are victims in their own right. A child who talks about violence, control or fear at home is reported like any other concern.
- 6.10 So-called 'honour'-based abuse, forced marriage and FGM.** Reported in the usual way. In addition, teachers and regulated health and social care professionals have a personal legal duty under the FGM Act 2003 to report to the police (101) where a girl under 18 says she has had FGM or they see signs of it. Switch staff are not teachers, but the DSL reports any such disclosure or observation to the police the same day, as well as to the school DSL and children's social care.
- 6.11 Radicalisation and the Prevent duty.** Children can be drawn into terrorism or extremist ideologies, increasingly online. Signs include a sudden change in views, support for violence, secretive online activity and withdrawal from friends. Concerns go to the Switch DSL, who refers with the school DSL through the local Prevent referral route (Channel) or, if there is immediate risk, to the police.
- 6.12 Online harm.** Anything a child shows or tells staff about online abuse, grooming, sextortion, gambling or harmful content is reported. Switch does not provide devices or internet access to children.
- 6.13 Children with SEND, children with a social worker, looked-after children and young carers.** Many mentees are in one or more of these groups. Their behaviour or mood may be wrongly attributed to their needs; they may be more prone to isolation and bullying; they may find it harder to tell anyone. Staff must never assume a change in a child is "just their SEND", and must know at referral whether a child has a social worker, an EHCP or is looked after.

It could happen here. Staff must keep an attitude of "it could happen here" and, when concerned about a child, act in the child's best interests. If you are unsure, report. You will never be criticised for reporting a concern in good faith that turns out to be nothing.

7. WHAT TO DO IF YOU HAVE A CONCERN OR A CHILD DISCLOSES

If a child is in immediate danger or needs urgent medical attention, call 999 first. Then tell the school DSL and the Switch DSL.

- 7.1** A concern may come from what you see, what a child or anyone else tells you, or a pattern that builds over weeks. It does not have to reach a threshold before you report it. You are not deciding whether abuse has happened; you are passing on information to those who can.

If a child tells you something

7.2 Do:

- listen calmly and let them talk at their own pace;
- take what they say seriously and show it;
- tell them they were right to tell you and that it is not their fault;
- explain early that you cannot keep it secret and will need to tell someone whose job is to help keep them safe;
- ask only open questions if you need to be clear what is being said ("tell me more about that");
- report the same day and write it down as soon as you can, in the child's own words.

7.3 Do not:

- promise confidentiality;
- ask leading questions, investigate, or ask them to repeat the account to someone else;
- show shock, disbelief, anger or judgement;
- contact the alleged abuser, including a parent;
- discuss it with anyone other than the school DSL and Switch DSL;
- delay because the DSL is not available or because you are unsure.

Reporting

7.4 Report every concern **the same day** to both:

- 7.4.1** the **school DSL** for the child's school, in person or by phone before the end of the school day where possible (this is what we promise schools in the SLA); and
- 7.4.2** the **Switch DSL** (or Deputy), by phone, followed by the completed Child Protection Incident Record.

- 7.5** Complete the Child Protection Incident Record the same day, before leaving the site. Record facts, times, places, who was present, what the child said in their words and what you asked; keep opinion separate and label it. Send it to the DSL only from your @switchrugby.com account, never by WhatsApp, SMS or personal email.

- 7.6** The Switch DSL, with the school DSL, decides the next step: referral to children's social care, a school-led Family Help assessment, referral to the police or LADO, or monitoring with no

further action, and records the decision and reasons. The school will usually make the referral; Switch confirms it has been made.

- 7.7 Anyone can refer.** If you believe a child is at risk and the DSL or school has not acted, or you cannot reach either, you may and should refer directly to children's social care (section 2). Tell the Switch DSL that you have done so.
- 7.8 Escalation.** If the child's situation does not improve after a referral, the DSL presses children's social care and the school to reconsider and, if necessary, uses the local safeguarding partnership's escalation procedure. Staff who remain worried tell the DSL again.
- 7.9 Mentee not in school that day.** A concern about a mentee collected from home, or not attending school, is still reported to the Switch DSL the same day. The Switch DSL agrees the referral route with the school DSL; if the school DSL cannot be reached and the concern cannot wait, the Switch DSL refers direct to children's social care for the area where the child lives.
- 7.10 Family Help.** Some concerns are about need rather than harm. Where a child would benefit from co-ordinated early support, the DSL supports a school-led Family Help assessment and Switch contributes to the plan. If the family does not engage and concerns continue, the DSL considers a referral to children's social care.

8. SUBSTANCE MISUSE AND INTOXICATED YOUNG PEOPLE

- 8.1** A young person may on occasion present as being under the influence of drugs or alcohol, at the point of collection or during a session.
- 8.2** Principles:
- A young person who is intoxicated cannot safely take part in a mentoring session. No session proceeds in these circumstances, whatever the school, parent or carer asks.
 - Intoxication in a child is a safeguarding concern, not a behaviour management issue, and is treated as such.
 - Staff must not sign out or take off-site a young person they know or reasonably suspect to be intoxicated, but they keep a duty to keep that young person safe until a responsible adult or institution has taken over.
 - Every incident is reported to the DSL without delay and recorded on the same day.
- 8.3** Required response. When a young person is suspected or confirmed to be under the influence of a substance, the member of staff must:
- 8.3.1** not sign the young person out of school or take them off-site; where the young person is already in the member of staff's care, return them to the school or a responsible adult at the earliest safe opportunity;
 - 8.3.2** not leave the young person alone; remain with them until a responsible adult or the school has taken over;
 - 8.3.3** call 999 immediately if there is any concern about immediate physical safety, including drowsiness that cannot be roused, loss of consciousness, fitting, breathing difficulty or unresponsive behaviour;
 - 8.3.4** contact the DSL without delay, and in all cases before leaving the location;
 - 8.3.5** record the incident in full before leaving: time and place, a factual description of the young person's visible condition, who else was present and what was said, what was done and by whom.

- 8.4** The DSL considers whether the incident points to wider risk, including CCE, CSE, neglect or coercion by peers. Staff do not investigate; they report what they saw to the DSL, who decides with the school DSL whether a referral to children's social care or another agency is needed.
- 8.5** Staff must not handle, take or dispose of any substance or paraphernalia they see. They report it to the DSL, who decides whether to involve the police.

9. BEHAVIOUR, PHYSICAL CONTACT AND RESTRAINT

- 9.1** Physical contact in rugby coaching is normal and necessary: demonstrating technique, supporting a tackle or scrummage position, spotting, first aid, and comforting a distressed child. It is acceptable when it is for a clear purpose, the minimum necessary, in view of others, explained to the child, and stops if the child is uncomfortable. It is never used as punishment or in anger. In mentoring, physical contact is limited to what a reasonable adult would do in public: a handshake, a high five, a hand on the shoulder to steady or reassure.
- 9.2** No member of staff uses any form of corporal punishment or degrading treatment.
- 9.3** Physical restraint is a last resort, used only to prevent a child injuring themselves or someone else, or causing serious damage to property, and then only the minimum force for the shortest time. Staff never restrain to enforce compliance. Any use of restraint is recorded on the Child Protection Incident Record and reported to the Switch DSL, the school and the child's parent or carer the same day. Any complaint or concern about the use of force is dealt with under the LADO Procedures.
- 9.4** Behaviour expectations for children, and the graduated response to poor behaviour (reminder, formal warning with the school and parents informed, final warning, review of placement), are set out in the Behaviour Code for Children and Young People. That document takes precedence over anything here about sanctions.
- 9.5** Any child-on-child incident of the kind described in 6.4 is reported the same day to both the school DSL and the Switch DSL, who agree the response for each child involved, including the child alleged to have caused harm. Staff separate the children if needed to keep them safe, but do not leave the matter to parents to sort out and do not treat it as closed because the children have been separated.

10. ONLINE SAFETY, PHONES, IMAGES AND AI

- 10.1** Mentors use their personal phones to speak to schools and parents; Switch does not issue work phones. The rules that make this safe are:
- no direct calls or messages with any mentee under 18, by any channel; contact goes through the parent, carer or school;
 - no connection with any current or former mentee under 18 on personal social media, and no following, liking or messaging;
 - no mentee information in WhatsApp, SMS, personal email or notes apps, except the collection and return check-in messages in the Switch staff group chat in Google Chat, which use initials only; Session Logs and all records are kept only in the mentor's @switchrugby.com Google account;
 - mentee and parent contact details are deleted from the mentor's phone the day the mentee leaves the programme;
 - phones are not used during sessions except for the collection and return check-in messages in Google Chat, calls to the school or parent, sat-nav and emergencies.

- 10.2 No photographs or video of mentees**, for any purpose, on any device. Mentoring sessions are never recorded.
- 10.3** Images of children at rugby sessions, camps and the City of Bristol U16 programme may be taken only where the school (for school coaching) or the parent or carer (for camps and the U16 programme) has given consent that Switch holds, only on a device and account approved by the Director for that purpose, never a personal account or phone, and are stored, used and deleted under the Data Protection and Data Security Policy. Children are never identified by full name alongside an image, and no images are taken in changing areas.
- 10.4 Generative AI.** Staff must not enter a mentee's or any child's name, personal details, session notes or any information that could identify them into ChatGPT, Gemini, Copilot or any other AI tool, including tools built into phones and browsers. AI may be used for generic planning that contains no child data. Staff should be aware that children may use AI chatbots for companionship or advice and that AI can be used to generate abusive images; report any concern.
- 10.5** There is no online, virtual or remote mentoring. If a school asks for it, the answer is no unless and until a protocol is written into this policy.

11. ALLEGATIONS AND CONCERNS ABOUT ADULTS

Any allegation that an adult working for Switch has: behaved in a way that has harmed a child, or may have harmed a child; 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 behaved or may have behaved in a way that indicates they may not be suitable to work with children (including outside work) must reach the Switch DSL the same day. The DSL contacts the LADO within one working day. Full procedure: LADO Procedures.

- 11.1** Allegations meeting the harm threshold above are managed under the LADO Procedures. The Director is case manager. The school DSL is informed the same day where the allegation concerns work with that school's pupils, and the school and Switch co-operate as the LADO directs.
- 11.2** If the allegation or concern is about the Director, or you feel unable to raise it with him, report it directly to the LADO for the relevant area (section 2) and to the Deputy DSL. You may also call the NSPCC whistleblowing advice line on 0800 028 0285. The LADO then directs how the matter is managed; an independent person appointed by Switch who has had no prior involvement in the matter (normally an external HR adviser) acts as case manager.

Low-level concerns

- 11.3** A low-level concern is any concern, no matter how small and even if no more than a nagging doubt, that an adult working for or on behalf of Switch may have acted in a way that is inconsistent with the Behaviour Code for Adults (including conduct outside work) but that does not meet the harm threshold in the box at the start of this section. "Low-level" does not mean insignificant.
- 11.4** Examples in our setting: being over-friendly or having favourites; messaging or calling a mentee directly; changing a venue or route without telling anyone; a photo of a child on a personal phone; being alone with a child in an unplanned or secluded place; going into a mentee's home; humiliating a child; a coach entering a changing room alone.
- 11.5** Staff share low-level concerns about any colleague with the DSL (if about the DSL, with the Deputy DSL and LADO) the same day. The DSL records the concern, context and action taken on

the Low-Level Concern Record, speaks to the person concerned and keeps the record confidentially. Records are reviewed for patterns, and together at least annually; a pattern, or any doubt about the harm threshold, is discussed with the LADO. Records are kept until the person leaves Switch and then with the staff file. Low-level concerns are not mentioned in references unless investigated and found to be misconduct.

- 11.6 Self-referral.** Staff who realise they have behaved in a way that could be misunderstood, or have broken this policy or the Behaviour Code for Adults, should tell the DSL themselves the same day. Doing so promptly is treated as a sign of good practice.

Whistleblowing

- 11.7** Staff who believe Switch is failing in its safeguarding duties, or that a concern has not been acted on, use the Whistleblowing Policy. Where they feel unable to raise it internally they may contact the NSPCC whistleblowing advice line (0800 028 0285, help@nspcc.org.uk) or the relevant LADO directly. No one who raises a concern in good faith will be treated less favourably.

12. SAFER RECRUITMENT

- 12.1** Every role at Switch involves regulated activity with children. Following the Crime and Policing Act 2026 there is no "supervised" exemption. No one may have contact with children on behalf of Switch until an enhanced DBS check with children's barred list information, and every other pre-appointment check set out in the Safer Recruitment Policy, has been completed and recorded on the central record. Checks are renewed as that policy requires, and all staff sign an annual self-declaration. The Safer Recruitment Policy also covers induction, references, online searches and the central record that commissioning schools may inspect.

13. INFORMATION SHARING, RECORDS AND RETENTION

- 13.1** Fears about sharing information must not stand in the way of protecting a child. Consent is not needed to share with the school DSL, children's social care or the police where it is necessary to safeguard a child. UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025 allow this; the Data Protection and Data Security Policy sets out the lawful bases. Share what is relevant with the people who need it, and record what was shared and why. If unsure, ask the DSL rather than withhold.
- 13.2** The DSL keeps a separate child protection file for each child about whom a concern has been recorded: the Child Protection Incident Record(s), body map if used, correspondence with the school and agencies, the referral decision and reasons, follow-up and outcome. Files are held in the Switch Google Workspace, apart from the general mentee file, with access restricted to the DSL and Deputy DSL.
- 13.3** A copy of each Child Protection Incident Record is given to the school DSL. Where a child moves school, the DSL asks the school DSL to confirm the record has transferred with the child's file.
- 13.4** Retention (full schedule in the Data Protection and Data Security Policy):

Record	Kept until
Child protection concern records, referrals and DSL correspondence	The child's 25th birthday
General mentee file (referral, consent, Session Logs, reviews)	2 years after the programme ends; the 25th-birthday period if it holds a safeguarding concern or injury record

Record	Kept until
Records of allegations against staff (LADO cases)	Normal pension age or 10 years, whichever is longer; malicious allegations removed from the personnel file
Low-level concern records	Until the person leaves Switch, then with the staff file

14. WORKING WITH SCHOOLS

14.1 Switch gives every commissioning school:

- written assurance (the Statement of Assurance) that all staff have the checks in section 12 and the training in section 4, with an extract from the central record issued with the Statement of Assurance at the start of each academic year, and on request;
- notice before any change of the member of staff working with the school's pupils, with confirmation of that person's checks;
- same-day notification to the school DSL of any safeguarding concern about a pupil, any allegation against a member of Switch staff working with that school's pupils, and any restraint, injury or section 8 incident;
- a Session Log after every mentoring session.

14.2 Switch asks every school for:

- the name and contact details of the school DSL and deputy, and the school's own reporting procedure, before work starts;
- at referral, the information Switch needs to keep the child safe: whether the child has a social worker, an EHCP or is looked after; known risks including exploitation, missing episodes, allergies and medical needs; who may and may not collect the child; and any restriction on being left alone;
- prompt notice when any of that changes.

14.3 On school premises the school's own safeguarding procedures take precedence; Switch staff follow them and report to the school DSL first. Off-site, this policy applies and both DSLs are told.

15. REVIEW

15.1 The Director reviews this policy every September when the new edition of KCSIE takes effect, and sooner after a serious incident or a change in law, guidance or how Switch works. Staff sign to confirm they have read each reissued version.

Quick guide: what to do if you are worried about a child

1. Immediate danger or urgent medical need? Call **999**. Then follow the steps below.
2. Listen. Stay calm. Do not promise to keep it secret. Do not ask leading questions and do not investigate.
3. Tell the child they were right to tell you and that you will pass it on to someone whose job is to help.
4. The same day, tell the **school DSL** (before the end of the school day if you can).
5. The same day, phone the **Switch DSL Matt Sheppard 0117 233 7513**. Not available? Deputy DSL Louise Maynard (admin@switchrugby.com). Neither reachable and the child may be at risk? Call children's social care yourself (numbers in section 2).
6. Before you leave the site, complete the **Child Protection Incident Record**: facts, times, the child's own words, what you asked. Send it from your @switchrugby.com account only.
7. If the concern is about an adult who works for Switch, tell the Switch DSL the same day. About the Director? Go straight to the LADO and the Deputy DSL.
8. Nothing changes and you are still worried? Say so again. Anyone can refer directly to children's social care.
9. Keep it confidential. Do not discuss it with colleagues, parents or the person the concern is about.
10. If in doubt, report. You will never be in trouble for reporting a worry in good faith.

Approved by	Signature	Date
Matt Sheppard, Director and Designated Safeguarding Lead		1 September 2026