

RG44 Safeguarding Policy		Effective date: 11/2024
Authorised owner: Siobhan Mellor	Department(s) / Project team(s): Whole company	Last revision: 02/2026
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Safeguarding Policy

1. Introduction and statement of belief

1.1 Real Group Ltd and all subsidiary enterprises (including, but not limited to, Real Psychology, Dyslexia Action, The Dyslexia Guild, the Dyslexia Action shop and Real Training) believe all children and young people have the right to be protected from harm and to feel safe in all areas of their lives.

1.2 We recognise the responsibilities and duty placed upon all staff working for and on behalf of Real Group to undertake all work related activities with awareness of safeguarding, and the importance of promoting the welfare of every child, young person and vulnerable adult that we work with in schools or other organisations and settings. The annual review of our Safeguarding policy and practice includes consideration of safeguarding adults at risk as well as children, to ensure it remains relevant, appropriate, and responsive to emerging safeguarding landscape changes.

1.3 We recognise that abuse may occur within all cultures, religions and social groupings and that we need to be sensitive to the many differing factors that need to be taken into account in respect of these, whilst never allowing them to excuse behaviour that may be harmful, detrimental or illegal with regard to those groups covered by this policy.

1.4 We recognise that a child or young person who is abused or witnesses abuse or violence may find it difficult to develop and maintain a sense of self-worth. They may feel helpless and humiliated and may feel self-blame. This can have consequences for their resilience, mental health and future life outcomes.

1.5 We know that it is important that children and young people feel secure, are listened to in a sensitive and genuine way, and feel that any concerns they raise will be heard and acted upon responsibly and professionally.

1.6 Whilst this document at times refers specifically to Real Group Psychologists / Educational Psychologists and Tutors, it applies equally to all Real Group Associates and others working on



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behalf of Real Group whose work brings them into close or frequent contact with children and young people, with the broader principles applying to all staff regardless of their role or position.

1.7 All staff have a statutory duty to keep children safe and promote their welfare.

1.8 This policy and other relevant documents are highlighted to all staff during their induction / probation period, and when working for Real Group, in accordance with Appendix 1 (Roles & Responsibilities). This policy and other relevant documents are available on the sharing sites eg:

- PeopleHR
- Campus Online (in Tutor Hub > Section 3 Academic Policies > Safeguarding policy), Moodle and the
- Real Group website for access at any time by all staff employed by, or undertaking work on behalf of, Real Group.

1.9 Real Group Educational Psychologists are reminded regularly, through business meetings and team discussions, to be aware of these materials and company procedures, and to raise any concerns / substantive issues that arise during the course of practitioner or related work, with Real Group's Designated Safeguarding Lead (DSL) (Dr Joanna Wood and Deputy DSL Dr Siobhan Mellor, see Section 5 of this policy for further detail).

1.10 Real Group staff working with children and vulnerable groups are duty bound to report safeguarding concerns to the Designated Safeguarding Lead (DSL) in the educational setting, and to agree with them what action will be taken (where appropriate). They will also make Real Group's DSL or Deputy DSL aware of any concerns that have been reported to the school/setting DSL. In addition, they will subsequently enquire about the outcome of any actions agreed with the educational setting's DSL in such circumstances. In certain situations it may be appropriate to report concerns directly to the Local Authority Safeguarding Partnership team / Multi-Agency Safeguarding Hub (MASH) / 'Front Door' to Children's Social Care in the relevant authority.

1.11 Staff (notably Real Group Educational Psychologists) working in multiple Local Authorities must make themselves aware of the systems for each of the Local Safeguarding Children Partnerships they work in, as well as the contact details for the local Multi-Agency Safeguarding Hub (MASH) or other

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Local Safeguarding Children Partnership (LSCP) contact details including emergency out of hours contact details.

1.12 In terms of any actions taken by RG staff, the prime concern at all times must be the welfare and safety of the child and/or vulnerable adult, Where there is a conflict between the needs of the child and the parent/carer, the interests of the child must be paramount (Children Act 1989, 2004).

2. Aims of Policy

2.1 To raise awareness for all Real Group staff, and those providing services on behalf of Real Group, of the need to safeguard children and adults at risk and of their responsibilities in identifying and reporting possible cases of abuse.

2.2 To protect from harm all children and vulnerable adults who receive Real Group services.

2.3 To ensure systems are in place to embed safeguarding best practices across all commissioned or contracted services.

2.4 To emphasise the need for good communication processes in matters relating to child protection and safeguarding.

2.5 To outline a structured procedure within the company that will be followed by all staff in cases of suspected abuse.

2.6 To promote safe practice and challenge poor / unsafe practice.

2.7 To develop and promote effective working relationships with clients, partners and commissioning schools / organisations with regard to all aspects relating to the safeguarding and promotion of the welfare of children and vulnerable groups.

2.8 As a primarily online learning provider we aim to create a safe online learning environment. This includes protection from radicalisation and fostering a respectful environment free from harassment. These policies apply equally to adults, young people, children, and staff.

2.9 To provide staff and freelance tutors/suppliers, as well as children and young people and their families, with the overarching principles that guide our approach to safeguarding and child protection.



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2.10 This policy applies to anyone working on behalf of Real Group, including senior managers and the board of directors, paid staff, freelance staff, volunteers, sessional workers, agency staff and any students.

3. Legal Framework and Supporting Documentation

3.1 Real Group takes seriously its responsibility to protect and safeguard children. This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children, as outlined in the related documents listed in section 16 of this policy.

3.2 In addition to child protection legislation, this policy acknowledges the legal framework for safeguarding adults. For individuals aged 16 and over, Real Group demonstrates that consideration of the Mental Capacity Act (MCA) 2005 is an integral part of relevant decision-making and safeguarding processes, where applicable. For those aged 18 and over, we ensure that consideration of Deprivation of Liberty Safeguards (DoLS) is central to decision-making and the safeguarding process where applicable.

4. Definitions

A child is defined as anyone who has not yet reached their 18th birthday, including unborn children.

4.1 Safeguarding means:

- a. Proactively promoting child wellbeing and protecting children from maltreatment. It is not just about parental capacity. *Child Protection* is part of safeguarding. Child protection involves noticing and protecting children at risk of, or experiencing, significant harm.
- b. Preventing impairment of children’s mental and physical health or development.
- c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- d. Taking action to enable all children to have the best outcomes.
- e. Proactively supporting vulnerable adults to protect their right to live in safety, free from abuse, neglect, and exploitation. It involves proactive measures to prevent harm and reactive steps to

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stop abuse, focusing on empowering individuals with care and support needs while promoting their health, well-being, and, where possible, their autonomy and agency.

4.2. Definitions of Abuse

4.2.1 Abuse:

- (a) a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known or unknown to them. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.
- (b) Abuse of a vulnerable adult is the misuse of power, trust, or authority over an individual (18+) who has a physical/mental disability or impairment, or requires assistance with basic needs, causing them harm, distress, or violation of rights. It can be a single incident or a pattern of behaviour, including physical, sexual, psychological, financial, or discriminatory actions, as well as neglect.

4.2.2 The indicators and definitions of types of abuse and neglect are broadly defined below:

- (a) **Physical abuse:** a form of abuse which 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 the symptoms of, or deliberately induces, illness in a child.
- (b) Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or '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 a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to

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feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse in adults is a pattern of non-physical behaviours such as intimidation, control, humiliation, and isolation designed to undermine a person's self-worth, identity, and mental health. It is often a tactic of power and control in relationships

- (c) **Sexual abuse:** involves forcing or enticing a child or young person 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, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see Part 5 of KCSIE, 2024).
- (d) **Neglect:** 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 occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4.2.3 There also needs to be consideration of wider contextual and specific forms of abuse, including but not limited to:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation,
- Serious Youth Violence,
- Youth produced sexual imagery (known as sexting),
- Female Genital Mutilation (FGM)

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- Preventing Radicalisation/The Prevent Duty,
- child on child abuse.
- Adult Safeguarding
- Missing Persons (including young people missing from care)
- Child Trafficking
- Gang Exploitation

5. Roles and Responsibilities of Real Group DSL and Deputy DSL

5.1 **Dr Joanna Wood** is the Designated Safeguarding Lead (DSL) and Real Psychology Manager with: **Dr Siobhan Mellor** as Deputy DSL for Real Group and work undertaken with other organisations and individuals operating within and in association with Real Group.

Their contact details are:

- Dr Joanna Wood: 020 7183 3318
- Dr Siobhan Mellor: 01273 358080 (or email siobhan@realgroup.co.uk for out of hours contact)

5.2 Real Group ensures there are adequate, proportionate, and dedicated resources to meet safeguarding responsibilities. All staff have clear accountability for safeguarding responsibilities and are directly accountable to the organisation's named safeguarding persons (DSL/Deputy DSL).

5.3 The DSL and Deputy DSL work as a team and their responsibilities include:

- Being alert and recognising any child safeguarding issues;
- Raising and sharing concerns they may have about a child;
- Recognising when it is appropriate to make a referral to social care and contacting them when necessary;
- Where necessary, contributing to any plans and decisions regarding a child;
- Understanding the importance of safer recruitment;
- Participating in regular training and ensuring that their knowledge is up to date;
- Ensuring other staff members are trained adequately in safeguarding procedures and follow correct practices;
- Challenging poor safeguarding practice in the workplace;
- Maintaining accurate and secure records.

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5.4 The Deputy DSL holds the same responsibilities and is an additional point of contact when the DSL has not been able to be the first point of contact, as well as undertaking the lead in deputised duties such as; policy updates, safer recruitment, monitoring and sourcing of staff training. The DSL as Real Psychology Manager is the key safeguarding contact for Real Group Educational Psychologists. The Deputy DSL as Director of Pedagogy and Learning Team (PEDaL) is the key point of contact for all other Real Group staff. Further detail on roles and responsibilities across the Real Group team are included in Appendix 1.

6. Disclosure

6.1 Where a child or adult makes a disclosure, the Real Group staff member should refer to the appropriate DSL. In a situation of disclosure, Real Group staff should:

- **Be calm and level headed:** Appearing calm and relaxed will encourage the child or adult to trust you.
- **Reassure the person:** let them know they were right to tell you, tell them that they are not to blame and thank them for being brave.
- **Listen well:** give the child or adult the chance to speak, don't rush them and listen carefully to everything they say. This is vital as you will need to record their disclosure later on if not possible at the time.

6.2 In a situation of disclosure, Real Group staff should **avoid**:

- **Making promises or agreeing to keep information secret.** Do not promise the child or adult that you will keep their disclosure to yourself. Do not make promises you will not be able to keep. Say that you will get help from someone else as it is your responsibility to keep them safe.
- **Making assumptions** about what the child is experiencing, or implying disbelief.
- **Asking leading questions** and 'putting words into the child's mouth'.
- **Describing the potential abuser using negative words because they may be someone the child loves.**
- **Posing many questions in an interview approach.** It is the responsibility of social care or the police to find out more information.

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7. Referral Procedures

7.1 All staff working for Real Group are expected to recognise the signs and symptoms that indicate possible abuse and to make referrals to: the appropriate local DSL in the educational setting, the Real Group DSL / Deputy DSL, the local MASH / local Safeguarding Children Partnership, and / or the Local Authority Designated Officer (LADO) where appropriate.

7.2 Any referrals to the setting DSL, Children's Services or to the LADO will be recorded in the Real Group Safeguarding Log. The DSL / Deputy DSL will track outcomes in each case and close each case in the log when no further action is required. See the Referral section below for further detail about procedures following a safeguarding concern. See Appendix 2 for details of the Real Group Safeguarding Log.

7.3 The majority of cases / concerns that warrant a referral to local Children's Services are likely to emerge or be clarified through consultation or ongoing work with staff in educational settings. This is likely to be primarily the setting's DSL. In such circumstances it would be more appropriate for the DSL in the school or other establishment to make the referral where they have evidence related to suspected abuse. The Real Group Psychologist / Real Group staff would be responsible for giving a clear view on the need for a referral and agreeing with the setting when and who would do this. The Real Group DSL or Deputy DSL must be kept informed of all such situations.

7.4 It is the Real Group staff member's responsibility, in situations where there might be a significant risk, to check and ensure that information has been passed on within the setting and that a referral has been made as appropriate. This might be done for example by phoning the setting DSL / referrer to enquire how things have progressed or contacting the MASH/LSCP. In clear cases of significant current risk, this would all need to be carried out on the same day.

7.5 Where concerns have been raised as part of a multi-agency meeting, then it is good practice to collectively decide who should carry out any agreed action such as a referral, and who will support the referrer.

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7.6 Referrals to the relevant MASH or LSCP should be made within one working day of the concern being recognised. Urgent referrals should be made immediately, and wherever possible in consultation with the Real Group DSL or Deputy DSL.

7.7 Any concerns and action taken in response to concerns must be recorded and stored securely in the child's case file and kept updated. A record of discussions with management, supervisors, DSLs and any other parties related to the case must be kept. See Appendix 2 for the details recorded in the Real Group Safeguarding Log.

7.8 Real Group staff may sometimes be involved in Child Protection Conferences, Core Groups or other safeguarding meetings. Real Group staff, including DSLs, will attend safeguarding meetings where there are clear grounds for them doing so (e.g. a disclosure has been made to them during the course of an assessment), or when there is an agreement with the client or commissioner that this would be helpful. In other circumstances written submissions of involvement may be sufficient.

7.9 In all instances, Real Group Educational Psychologists will be governed by the British Psychological Society's (BPS) code of conduct and ethical principles with regard to child protection. In general, these are likely to accord with company policy, but if for some reason these are in conflict, this should be raised with management and the DSL / DDSL.

9. Advice

9.1 Where a Real Group Educational Psychologist or staff member is uncertain of the issues or actions that should be taken in relation to a piece of casework then these concerns should be discussed with the line manager and/or DSL or Deputy DSL as soon as possible. Be aware that it may not be appropriate to wait for a scheduled supervision session to discuss such concerns, depending on the issues.

9.2 There can be wider contextual issues that impact on children's well-being and mental health. Behaviour and / or mental health problems can be an indicator a child is at risk of suffering abuse, neglect or exploitation. See page 13 of KCSIE 2024 for factors which may contribute to poor or non-attendance at school. Real Group staff should be alert to these as part of ongoing casework, alongside consideration of causal factors that might include:

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- Having been the victim of bullying or other crime, leading to fear of school;
- Other anxiety or complicating issues related to home circumstances;
- Young carer responsibilities;
- Drugs and substance misuse.

9.3 Real Group staff have a responsibility to raise such issues with a relevant member of staff within the school or other setting if they see them, and where appropriate with other agencies.

9.4 Local threshold guidance can be accessed for the area in which the child resides and can be a source of support for the DSL and staff member to make a decision as to the appropriate next steps.

9.5 There is considerable evidence that Child Protection and Safeguarding is most effective when agencies work cooperatively together and in partnership with families. Appropriate information sharing is a key element to successful partnership working. Real Group staff will share information with relevant colleagues when appropriate to ensure a child is kept safe from harm and to assist with child protection investigations. Information will be shared in other circumstances when necessary, with consent from the child (dependent on age and understanding) and their parent or carer.

9.5 KCSIE guidance provides a reminder that data protection should not stop the sharing of information for safeguarding purposes. ‘Safeguarding of children and individuals at risk’ is a processing condition that allows you to share special category data. For further guidance see the ‘7 golden rules’ contained within this document:

[Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers](#) (DfE, 2024) Note: when acting on the advice of the statutory agency, if there are indecent images that form part of the evidence, do not view or share such images.

10. Safer Recruitment

10.1 All recruitment for Real Group Educational Psychologists, tutors or other staff coming into direct contact with children, will be subject to safer recruitment procedures appropriate for the role, including an Enhanced DBS with barred list check. Staff in roles which grant access to the data generated by other staff working in direct contact with children and vulnerable adults will be required to have a basic DBS check.

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10.2 Educational Psychologists and staff working in roles involving direct work with children and adult clients receiving psychological therapies will be subject to the following statutory requirements for safer recruitment:

- (a) During the interview, the candidate's understanding of safeguarding issues and procedures, and their motivation for working with children and young people, will be tested in an interview.
- (b) Any gaps in employment will be questioned and explored.
- (c) References will always be taken up and the most recent employer will be contacted by phone for a 'safer recruitment' discussion about the candidate's suitability for working with children and vulnerable adults.
- (d) Qualifications will be checked, including registration checks for Educational Psychologists (HCPC)
- (e) It is the responsibility of each Real Group Educational Psychologist, and also the Real Group Head of People and Real Psychology Administrator, to ensure that their personal DBS check is carried out annually.
- (f) Online Searches / social media check will be undertaken.
- (g) Enhanced DBS and Barred List Check. It is our policy that an Enhanced DBS with barred list check is required for all staff coming into direct contact with children and vulnerable adults. The DSL must ensure that an accurate, up-to-date DBS database is maintained. As Educational Psychologists are unable to practise without a valid and up-to-date DBS check, Real Group will fund such checks for directly employed Educational Psychologists as a legitimate business expense.
- (h) Overseas applicants and those who have worked abroad, will be checked following Home Office guidance. A letter of professional standing will be obtained from the professional regulating authority where appropriate. Advice about which regulatory or professional body should be contacted is available from the National Recognition Information Centre for the United Kingdom, UK NARIC.

See Appendix 1 (Roles & Responsibilities) which has a link to Real Group's Safer Recruitment template and Appendix 3 for Real Group's DBS Policy.

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11. Concerns, allegations and whistleblowing

11.1 Whistleblowing. Real Group maintains a clear 'Whistleblowing' procedure. All Real Group staff have a duty to raise legitimate concerns about the conduct of colleagues in the company, schools or other settings, especially in relation to poor or unsafe practice, and should expect that managers will deal with these issues sensitively and appropriately. Staff are encouraged and supported to raise safeguarding concerns against colleagues or managers if they believe practice is unsafe or unethical. These procedures are clearly understood and must be followed without fear of reprisal.

11.2 Managing Allegations Against Staff. Any safeguarding allegations (or potential allegations) about a member of Real Group staff, either in the Real Psychology service or another section of Real Group, should be passed straight to the Real Group DSL and / or Real Group Head of People and / or Directors. This procedure includes managing situations where the actions of an individual in their personal life may indicate that their behaviour could be a risk of harm to children or vulnerable adults they work with (transferable risk).

11.3 Managing concerns by our staff when working in other settings. Where concerns have been raised about a member of school staff or staff of other client organisations, in the first instance the Real Group Psychologist or staff member should raise these with a member of the management in that school / setting, usually the Headteacher. If for some reason that is not possible, then the issue should be discussed with the Real Group DSL to consider appropriate further actions. The Safeguarding process in the host setting should be followed, and then reported to the Real Group DSL.

11.4 Managing complaints. There is a formal complaints policy and procedure in place for clients, families, and external bodies to raise concerns regarding the provision of services or safeguarding conduct.

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12. Training and supervision

12.1 Real Group will ensure that all staff undertake, and are given the opportunity to attend or access, face to face or on-line, role appropriate, training in Child Protection and wider safeguarding issues, in order to ensure that they have the necessary skills and knowledge to deal appropriately with any issues that may arise in their particular roles. For Educational Psychologists, this may include training in consultation / supervision so as to support colleagues in education or other settings. See Appendix 4 for details of the training plan for different Real Group staff groups.

12.2 Safeguarding is a standing item in Real Psychology meetings, including discussion of casework, policy and internal systems. Directly employed Real Psychology Educational Psychologists will also be provided with regular supervision from a suitably qualified Senior Educational Psychologist, and also a clear line management relationship within Real Group. Supervision records should be kept in line with general BPS good practice. All lower level safeguarding concerns should be discussed in supervision, as well as any issues of a more general nature that the psychologist has encountered in their work relating to child protection or safeguarding. Whenever a Real Group Educational Psychologist (whether directly employed or working as an Associate Educational Psychologist) has safeguarding questions or concerns, they must seek supervision as soon as possible after the school visit. When specific individuals are discussed, a note of the discussion should be made in the child's file.

12.3 The Real Group Safeguarding Log will be filled in by the DSL / DDSL for all situations when a Real Group Educational Psychologist has referred a safeguarding concern to the school DSL. Cases will only be closed in the log when the Educational Psychologist has followed up school DSL actions.

12.4 The Real Psychology Manager (supported by the Real Group Human Resources team) will ensure that all Real Group Educational Psychologists complete DSL level safeguarding training every three years. In addition to DSL level training, safeguarding training will sometimes be highlighted by Real Group management, and individual Educational Psychologists will have a responsibility to ensure their knowledge base is up-to-date, identifying their own needs for additional training, e.g. linked to their caseload and work. Training needs should be discussed in supervision or via line management. Associate Educational Psychologists have access to DSL level safeguarding training for

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free via Real Group, or need to evidence external safeguarding training, as described in Appendix 4. The Real Psychology Administrator will keep accurate and up-to-date records of Educational Psychologists' training.

13. Mitigating risk when working directly with young people

13.1 Real Group staff working in one-to-one situations with children and young people in quiet, private spaces in educational settings and homes may be vulnerable to allegations made against them. Real Group staff should recognise this possibility and plan and conduct meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and pupils are met.

13.2 Methods to mitigate risk include: carefully considering the needs and circumstances of the child/children involved and weighing this against risk; considering whether a member of school staff should be present or close by for the work; always reporting any situation where a child becomes dysregulated / upset to a member of the school staff and to a senior colleague as soon as is practical.

13.3 Extra caution may be required where it is known that a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse. It is recognised that children may initiate inappropriate physical contact. Should this occur, Real Group staff should deter the child sensitively by helping them to understand the importance of personal boundaries, and if necessary remove themselves from the situation as soon as is feasible and alert other members of staff or other responsible adults in the vicinity.

13.4 The general culture of 'no / minimal touch' should be adopted in all interactions with children and young people.

14. Mitigating risk within our courses

14.1 Research projects involving children, young people or adults at risk require ethics approval to ensure compliance with statutory requirements and best practice guidelines. Participation in research will be conducted in accordance with approval from the relevant ethics committee. Where relevant,

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informed written consent will be obtained from parents/carers (or another adult acting in loco parentis) with regards to activities involving children and young people.

14.2 Programmes of study or learning activities involving the teaching or assessment of young people require clear consent processes to be followed. As an online learning provider, we aim to create a safe online learning environment with:

- **Open communication:** We encourage open communication and reporting of any concerns regarding online safety via the ‘help’ icon.
- **A respectful environment:** We foster a respectful and inclusive online learning environment free from bullying, harassment, or discrimination.
- **Digital citizenship:** We promote responsible digital behaviour and educate participants on online safety practices.
- **Secure platforms:** We utilise online learning platforms with robust security measures, including user authentication and data encryption.
- **Active engagement with the UK Government’s Prevent Duty** to help prevent the risk of people becoming terrorists or supporting terrorism.
- **Clear Usernames:** Students will be required to use professional usernames.
- **Password Management:** We encourage strong password practices and may require periodic password changes.

15. Review

The procedures contained within this policy will be monitored through:

- supervision / line management of each psychologist or staff member working directly with children and young people.
- monthly review of the safeguarding log by both the DSL and DDSL. Discussions are recorded, actions are logged and reviewed to ensure they are carried out in a timely way. Where deemed necessary, Real Group Executive Board members are made aware of safeguarding issues and risks affecting the organisation.
- Annual review of this policy by both the DSL and DDSL.

Real Group Executive Board members demonstrate a commitment to safeguarding and hold the organisation and staff to account regarding these responsibilities.

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16. Related Documents

IP04 Information Security Policy
 IP16 Customer Complaints Handling Process
 IP37 Password Security Policy
 RG41 Equality, Diversity and Inclusion Policy in Relation to Education Provision
 RG66 Managing Critical Incidents: A policy for Real Psychologists and a framework for schools

Real Group takes seriously its responsibility to protect and safeguard children and follows the legislation and guidance outlined below:

- A summary of the key legislation is available here:
<https://learning.nspcc.org.uk/child-protection-system/england>
- [Keeping children safe in education 2025](#) (DfE, 2025) (accessed 16.2.26)
- [Working together to safeguard children](#) (DfE, 2025) (accessed 16.2.26)
- [Information sharing advice for safeguarding practitioners](#) (DfE, 2024) (accessed 16.2.26)
- [Child abuse concerns: guide for practitioners](#) (DfE, 2015) (accessed 16.2.26)
- [Safer Recruitment: Safer Working Practices Policy Framework](#) (MoJ & YCS, 2025) (accessed 16.2.26)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DSIT, 2024) (accessed 16.2.26)
- [Child sexual exploitation](#) (DfE, 2017) (accessed 16.2.26)
- [Mental Capacity Act 2005](#) (accessed 16.2.26)
- [Children Act 2004](#) (accessed 16.2.26)

17. Document history

Issue 1 - Initial release
 Issue 2 - January 2024
 Issue 3 - November 2024
 Issue 4 - February 2026

18. Appendices



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Appendix 1: Roles & Responsibilities

Role / responsibility / action	Who	How often
Completing training in Safer Recruitment	(a) Real Psychology Manager (b) Head of People, to ensure the initial advert & subsequent process is compliant. (c) Line Manager of staff requiring Safer Recruitment processes	Within the two years prior to a recruitment process
Oversight of the Safer Recruitment process at the recruitment stage.	HR team and line managers. See the following template for more detail: Safer Recruitment Additional Tasks Template	Template to be used in recruitment to all roles requiring a DBS
Establishing and monitoring DBS systems. Quarterly DBS review meetings in which the task of checking the DBS Database is up to date is routinely undertaken	HR and DSL	Quarterly
Completing DBS checks and keeping the DBS Database up to date.	HR	Before the DBS renewal date for each person on the DBS Database, using the update service where available.
Planning, implementing and monitoring of training and supervision for all staff.	DSL & DDSL See also Appendix 4	Yearly review
Reporting safeguarding concerns if you are an EP (a) to the DSL within the school and (b) to the RG DSL	EP	Whenever there is a safeguarding concern which involves the school DSL, the EP should see the school DSL as soon as possible and always before leaving the setting. They should contact the RG DSL that same day.
Logging and resolving safeguarding concerns - for	DSL and EP	As soon as possible after the incident.

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EPs doing RP work		
Logging and resolving safeguarding concerns if you are a Real Group staff member who is not an EP	Deputy DSL	Immediately on recognising a concern, it should be reported to the Deputy DSL for discussion, logging and resolution.
RG Safeguarding Log Review (a) Review meeting (b) Policy review	DSL and Deputy DSL	(a) Termly (b) Annually
Investigating and managing complaints / concerns about members of staff as linked to safeguarding of children / young people	HR, in consultation with DSL, Line Managers and Directors. Insurers may also need to be informed.	As each arises.

Appendix 2: Real Group Safeguarding Log - data collected.

1. Reference Number;
2. Date of incident;
3. Category of Abuse;
4. Short narrative of what took place;
5. Name/initials of person reporting the concern;
6. Action taken;
7. Any referrals made to outside agencies such as LADO, police, social services;
8. Outcomes;
9. Case open or closed.

Appendix 3: Real Group DBS Policy

1. Context, scope and purpose of this policy:

Keeping Children Safe in Education - see link in section 16 of this policy

It is a statutory requirement (KCSIE, Department for Education, 2025) that all schools, academies and colleges keep and maintain an accurate Single Central Record (SCR).

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A SCR ('The Register') is a central record of the safeguarding checks that have been carried out on all staff and relevant people in the setting.

Real Group (RG) is not a school, academy or college, and therefore is not required to keep a SCR. However, RG employees who work directly with children and young people, and those in the IT team who have access to their work, do need to be DBS checked. In addition, RG is committed to safeguarding children, including through safer recruitment. As such, RG keeps and maintains a DBS database. This policy details why and how RG's DBS database is kept and maintained.

Scope of this policy: All RG employees engaging in or seeking to engage in 'regulated activity', and those with access to children's files (IT team). Regulated activity is direct work with children.

2. **What is the purpose of the RG DBS database:** To accurately record the status of all employees at RG who are required to have a DBS check.
3. **Who in RG needs a DBS check, and at what level:**
 - All Educational Psychologists (EPs): Enhanced Check
 - All Associate EPs: Enhanced Check
 - RP Administrator: Basic Check
 - IT Team: Basic Check
4. **How is RG DBS information stored?** The RG DBS database is kept securely as a sheet in Google Drive, only accessible to: HR, Head of IT, RP Administrator, RP Manager, DSL, Deputy DSL, Head of PEDaL, Directors of RG.
5. **Details to be included in the RG DBS Database:**
 - Full name
 - DOB
 - Job title
 - Application status
 - Date application created
 - Start date of employment
 - DBS certificate number
 - DBS disclosure number
 - Means of renewal - update service set up & renewal date
 - HCPC number
 - References - date collected reference #1, reference #2
 - Barred list checked - yes / no - applicable only if the employee has ever been a teacher and only if they are engaged in or seeking to engage in regulated activity.

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6. **Access to the barred list:**

This check will **only** be done for new RG employees engaging in regulated activity with children and who have ever been teachers. This is likely only to be new EPs. KCSIE states: *The barred list must not be requested on any person who is not engaging in or seeking to engage in regulated activity.*

7. **Timeframe for updates to the RG DBS Database:** Basic checks to be completed every 3 years. Enhanced checks to be completed every year via the update service.

8. **Monitoring process**

Who is responsible for keeping the DBS Database up to date: HR

Who is responsible for checking the DBS Database is up to date: DSL

How often will the DSL check the database? Three times yearly. Broadly: September; January; May.

9. **Removal from the RG DBS database:** in the case of a SCR, staff need to be removed from it when they no longer work at the educational provision. In the case of the RG DBS database, the details of EPs who have left the company will be kept for at least 5 years, to ensure that RG have the relevant information in the case of an enquiry from a school / parent / other party about a historic case.

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Appendix 4: Training plan for different staff groups

Staff Group	Access to Safeguarding policy	Training offer	Who ensures this happens?
Group 1 EPs (including Associate EPs)	During and after induction, via PeopleHR. During RP meetings - safeguarding is a standing item (policy discussion and application; sharing of learning from closed cases)	Mandatory DSL training every 3 years (online) Additional training arranged according to need.	Real Psychology Manager, supported by Human Resources (HR) and Real Psychology Administrator
Group 2a Employees who tutor delegates on Campus Online Group 2b Employees who tutor delegates on Moodle	During induction, via Moodle / Tutor Hub in Campus Online (Section 3 Academic policies > Safeguarding policy). After induction, via Tutor Hub / Moodle, prompted by Programme Leaders.	Access to KCSIE via Tutor Hub / Moodle. Basic online safeguarding training / evidence of external training.	Deputy DSL supported by HR
Group 3 IT team (who could be exposed to school settings via online support / live training support roles)	During and after induction, via PeopleHR.	Access to KCSIE via Tutor Hub, with follow up contextualisation provided in one IT team meeting a year by DSL and / or Deputy DSL.	Deputy DSL and DSL
Group 4 Employees who do not tutor	During and after induction, via PeopleHR.	Staff briefing annually to be written and sent to all staff by DSL/ Deputy DSL, which has links to KCSIE and the RG44 policy.	Deputy DSL and DSL

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Group 5 Freelance tutors on Campus Online	During and after induction, via Tutor Hub in Campus Online.	Task within Tutor Hub to read KCSIE and RG44. Contextualising activity to be added each year (e.g. examples of scenarios that you may encounter) and green tick monitored by Deputy DSL. Basic online safeguarding training / evidence of external training.	Deputy DSL
Group 6 Freelance tutors on Moodle	During and after induction, via Tutor Hub in Campus Online.	Task within Tutor Hub to read KCSIE and RG44. Contextualising activity to be added each year (e.g. examples of scenarios that you may encounter) and green tick monitored by Deputy DSL Basic online safeguarding training / evidence of external training.	Deputy DSL
Group 7 Freelance tutors (APC reviewers) for the Dyslexia Guild (on neither Campus Online nor Moodle)	During and after induction, via Tutor Hub in Campus Online.	Task within Tutor Hub to read KCSIE and RG44. Contextualising activity to be added each year (e.g. examples of scenarios that you may encounter) and green tick monitored by [*tbc - is it DSL / Deputy DSL or HR] Basic online safeguarding training /	Deputy DSL

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		evidence of external training.	
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Real Group reserves the right to review, revise, amend or replace the content of this policy, and introduce new policies and procedures from time to time to reflect the changing needs of the organisation and new legislation and regulations.