



# SAFEGUARDING UPDATE

WITH DR SANDRA WISEMAN

TUESDAY 23RD JUNE 2026 • ISSUE 180

## **Removal of the supervision exemption: What schools need to know from September 2026**

A significant change to safer recruitment and volunteer management **comes into force on 1st September 2026**.

For many years, schools have relied on the "supervision exemption" when determining whether certain volunteers were engaged in regulated activity. Under the previous arrangements, volunteers who were supervised by a member of staff undertaking regulated activity were often not themselves considered to be undertaking regulated activity. As a result, schools could not request a Children's Barred List check for those individuals.

### **That position is changing.**

The Crime and Policing Act 2026 removes the supervision exemption from the definition of regulated activity. This means that many volunteers and unpaid adults working closely with children will now be regarded as undertaking regulated activity, even when supervised.

### **What has changed?**

From 1st September 2026, unpaid individuals who teach, train, instruct, care for or supervise children will be considered to be engaging in regulated activity if they do so:

- **Frequently (more than three days in a 30-day period), or**
- **Overnight**

Previously, supervision by a member of staff undertaking regulated activity could remove the need for the volunteer to be treated as undertaking regulated activity themselves. That exemption has now been removed.

### **Why has this change been introduced?**

The change follows recommendations arising from the Independent Inquiry into Child Sexual Abuse (IICSA). The government identified that the previous exemption prevented schools and other organisations from checking whether some individuals working closely with children were included on the Children's Barred List.

The aim is to strengthen safeguarding arrangements by ensuring that individuals who have frequent contact with children can be subject to the highest level of DBS scrutiny regardless of whether they are supervised.

### **What does this mean for schools?**

Many schools will need to review their volunteer arrangements before September 2026.

#### **Examples may include:**

- **Reading volunteers**
- **Parent helpers**
- **School trip volunteers**
- **Sports coaches**
- **Music tutors**
- **Mentors**
- **Faith and community volunteers**
- **Governors who regularly undertake activities with pupils**

Where these individuals meet the frequency or overnight criteria, they may now require an Enhanced DBS check with Children's Barred List information.

### **School trips and residential visits**

The new guidance specifically confirms that volunteers participating in overnight school trips may fall within regulated activity because they meet the overnight condition. Schools should review arrangements for residential visits and ensure appropriate checks are completed in advance.

### **What should schools do now?**

#### **1. Audit existing volunteers**

Review all volunteers currently working in school and identify:

- **Their role**
- **Frequency of attendance**
- **Level of contact with children**
- **Whether they meet the regulated activity criteria from September 2026**

#### **2. Review recruitment procedures**

Update:

- **Safer recruitment procedures**
- **Volunteer policies**
- **DBS procedures**
- **Induction processes**
- **Risk assessment templates**

#### **3. Update the Single Central Record process**

Schools should ensure that systems for recording volunteer checks remain robust and that any newly required barred list checks are accurately recorded.

#### **4. Inform volunteers early**

Some long-standing volunteers may be unaware of the changes. Early communication can help manage expectations and avoid delays at the start of the academic year.

#### **5. Train leaders and governors**

DSLs, headteachers, HR leads and governors should understand:

- **The new definition of regulated activity**
- **DBS eligibility changes**
- **Implications for volunteer deployment**
- **Updated safer recruitment requirements**

### **Questions DSLs and school leaders should be asking**

- ✓ **Have we identified all volunteers who may now be undertaking regulated activity?**
- ✓ **Do our volunteer risk assessments reflect the September 2026 changes?**
- ✓ **Have we reviewed our DBS processes and timelines?**
- ✓ **Are governors aware of the new requirements?**
- ✓ **Have we updated our volunteer and safeguarding policies?**
- ✓ **Are residential and educational visit procedures compliant with the new arrangements?**

#### **Read:**

<https://www.gov.uk/government/publications/working-or-volunteering-in-regulated-activity-with-children/regulated-activity-removal-of-the-supervision-exemption-comes-into-force-1-september-2026>

## **Crime and Policing Act 2026: What schools need to know about the new Child Sexual Abuse Reporting Duty.**

### **A major safeguarding change is coming**

The Crime and Policing Act 2026 introduces one of the most significant safeguarding reforms in recent years, implementing key recommendations from the Independent Inquiry into Child Sexual Abuse (IICSA).

**For schools, the headline change is clear:** For the first time, there will be a statutory duty to report child sexual abuse. Whilst schools have long operated within strong safeguarding frameworks through Keeping Children Safe in Education (KCSIE) and Working Together to Safeguard Children, this new legislation places a specific legal duty on those working with children to report child sexual abuse in certain circumstances.

**Why has this change been introduced?** The Independent Inquiry into Child Sexual Abuse identified numerous occasions where opportunities to protect children were missed because concerns were not reported, escalated or acted upon appropriately.

The Government has accepted all 20 recommendations from IICSA and has begun implementing several key reforms through the Crime and Policing Act 2026. These reforms are intended to strengthen accountability, improve reporting and ensure that children are protected more effectively.

### **What is the new duty?**

The legislation introduces a statutory duty requiring individuals undertaking regulated activity with children to make a report when they become aware that a child is being sexually abused.

The duty applies when an individual:

- **Receives a disclosure from a child**
- **Receives a disclosure from a perpetrator**
- **Witnesses child sexual abuse**
- **Becomes directly aware that child sexual abuse has occurred**

Reports must be made to the police or children's social care as soon as reasonably practicable. The legislation makes clear that the purpose is to prevent further harm to children.

### **What does this mean for schools?**

The good news for schools is that most safeguarding procedures already reflect the expectations of the new law.

In practice, school staff are already expected to:

- **Report concerns immediately**
- **Pass disclosures to the DSL without delay**
- **Record concerns accurately**
- **Follow child protection procedures**
- **Refer concerns to children's social care and the police where appropriate**

However, the new legislation strengthens the legal framework around child sexual abuse reporting and reinforces the importance of timely action.

### **Can staff still report through the DSL?**

**Yes.** The legislation recognises existing safeguarding structures within organisations.

Only one report is required for each incident. A member of staff can continue to report concerns to the Designated Safeguarding Lead, provided they are satisfied that a report has been made or will be made promptly to the appropriate agency. This reflects current safeguarding practice within schools.

### **This means the DSL remains central to safeguarding decision-making, coordination and referrals. What about failure to report?**

The legislation introduces consequences for individuals who fail to comply with the duty.

Although the focus remains on safeguarding children rather than punishing professionals, failure to report may result in regulatory or safeguarding consequences, including consideration by the Disclosure and Barring Service (DBS) in relevant cases.

### **For school leaders, this highlights the importance of ensuring that staff understand:**

- **What constitutes child sexual abuse**
- **How to respond to disclosures**
- **When concerns must be reported**
- **The school's safeguarding procedures**
- **The role of the DSL and safeguarding team**

#### **Read:**

<https://www.gov.uk/government/publications/crime-and-policing-act-2026-factsheets/crime-and-policing-act-2026-independent-inquiry-into-child-sexual-abuse-recommendations-factsheet>

### **Summer term 2 - 5-minute 'bitesize' and audio version safeguarding refresher videos**

**Domestic abuse - Tuesday 30<sup>th</sup> June**

**Radicalisation and extremism - Tuesday 7<sup>th</sup> July**

**Cybercrime - Tuesday 14<sup>th</sup> July**

**KCSIE 2026 - Date to be confirmed**

**Dr Sandra Wiseman**

**S4S Safeguarding Lead/Specialist**

**Sandra.Wiseman@services4schools.org.uk**

**Mobile: 07786 582266**