Safeguarding Assurance for External Individuals and Organisations Engaged by Schools and Education Settings

To be read in conjunction with Circular 2026/22 Safer Recruitment and Pre Engagement Checks for People Working, Volunteering and Providing Commissioned Services in Schools, EOTAS centres, Early Years Settings, Youth Settings, Managing Authorities and other educational settings.

The Department is issuing the attached **External Provider Safeguarding Assurance Checklist** to support schools and other education settings when engaging external organisations or individuals to work directly with children and young people.

The checklist applies where a school or other education setting **independently** engages or invites external organisations, services or individuals to deliver activities within the setting.

Examples of external roles which may require school to use the checklist include sports coaches employed by the IFA/Ulster Rugby/GAA, external tutors, dance instructors, health & wellbeing programme facilitators, voluntary and community organisations delivering programmes to support curriculum, charities, mentors, youth workers not employed by the Education Authority and other external personnel. **This list is not exhaustive.**

It does not apply to services commissioned through the Education Authority, CCMS or other public bodies whose staff remain employed and managed by those bodies e.g. Health and Social Care Trusts, Public Health Agency, PSNI or Department for the Economy Careers Service.

Key Legislative Change

As you are aware, from **1 September 2026**, the previous supervision exemption from regulated activity relating to children is removed.

This means that, where an external person frequently undertakes teaching, training, instruction, care or supervision of children or another activity falling within the statutory

definition, the presence of a teacher or other member of staff will no longer prevent that work from being regulated activity[1].

Settings must therefore **not** conclude:

"A member of staff will remain present, so the external person is not undertaking regulated activity."

The assessment must be based on what the person will actually do, the circumstances in which the activity will take place and whether the applicable statutory conditions are met.

The change does not mean that every visitor to an education setting automatically requires an Enhanced Access NI check. A proportionate, role and activity-based assessment remains necessary.

Purpose of the checklist

The checklist is intended to provide a consistent framework for:

- identifying the provider, individual personnel and proposed activity;
- assessing whether the role constitutes regulated activity;
- obtaining appropriate written assurance about Access NI and barred-list arrangements where applicable;
- examining the provider's wider safeguarding, recruitment and conduct arrangements;
- considering the suitability of the programme and its materials;
- agreeing how disclosures and safeguarding concerns will be managed;
- briefing external personnel on the setting's safeguarding procedures; and
- recording the decision to approve, condition, defer or refuse the proposed provision.

The checklist separates two important questions:

1. **Have the applicable statutory vetting and barred-list requirements been satisfied?**
2. **Is the provider and proposed programme otherwise suitable and safe for the children involved?**

An Access NI disclosure is an important safeguarding measure, but it does not, by itself, establish that an individual, organisation or programme is suitable.

[1] Regulated Activity Definition The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007

How the checklist should be used

The checklist should be completed before a new external provider, or individual begins direct work with children.

Settings should also use it to review existing recurring provision that was previously in place before 1 September 2026, particularly where the arrangement may previously have relied on the person being supervised by school staff.

The assessment should be completed by an appropriately authorised member of staff, involving the Designated Teacher for Child Protection where safeguarding considerations arise. The completed checklist and supporting written assurances should be retained in accordance with the setting's record management arrangements.

Education settings are not expected routinely to duplicate safer recruitment and vetting checks properly undertaken by the external organisation responsible for employing or deploying the individual. They should, however, obtain and retain sufficient written assurance that the appropriate requirements have been met.

For those individuals or providers that are self-employed, Enhanced Disclosure Checks are available – settings may wish to request to see those checks as part of the assurance process as they will not have been subject to an additional verification by an 'employer'.

Where the role constitutes regulated activity, the individual **must not** undertake that activity until the required assurance is in place. If the setting or provider is uncertain whether the activity meets the statutory definition, appropriate advice from Education Authority Child Protection Support service or relevant safeguarding advice provider should be obtained before delivery begins.

The checklist should be reviewed where there is a material change to:

- the provider or personnel undertaking the activity;
- the nature, frequency or location of delivery;
- the age or needs of the pupils involved;
- arrangements for one-to-one, online or unsupervised contact; or
- any information relevant to the suitability of the provider or individual.

Programmes likely to generate disclosures

Additional planning is required where an external programme addresses sensitive subjects such as healthy relationships, domestic or sexual abuse, exploitation, mental health, suicide or self-harm, bullying, online harm, violence or substance use.

Before delivery, the setting and provider should agree:

- the content of the programme including assurances that it is in line with Departmental policies and statutory obligations;
- how a pupil disclosure or safeguarding concern will be responded to;
- how the concern will be passed promptly to the Designated Teacher;
- whether the Designated Teacher or a deputy should be available during or immediately after the session;
- what support or signposting will be available to pupils; and
- that the external person must not investigate concerns or promise confidentiality.

External providers should not operate a separate safeguarding route which bypasses the setting's Designated Teacher arrangements, unless required by law or forming part of an agreed statutory safeguarding pathway.

Alignment with Departmental Policies, Guidance and Statutory Obligations.

Officials wrote to schools (2 September 2026) to outline that any engagement of external organisations is undertaken in accordance with all relevant Departmental policies, guidance and statutory obligations. Individual schools remain responsible for ensuring that any materials, resources, presentations or activities delivered within the school are suitable for pupils, align with the school's ethos and curriculum requirements, and comply fully with Departmental expectations and safeguarding requirements.

Schools should carry out appropriate due diligence before engaging any external organisation and should satisfy themselves that the content, materials and delivery methods are consistent with Departmental policy and the educational needs of their pupils.

In addition, schools are expected to engage proactively with parents and carers prior to any event, programme or activity involving an external organisation. Parents should be provided with clear and timely information regarding the nature, purpose and content of the event, including details of the external organisation involved. Schools must ensure that parents have a reasonable opportunity to raise any questions or concerns and, where they wish to do so, to withdraw their child from participation in the event or activity.

Governance and assurance

Principals and leaders of settings should ensure that the checklist is incorporated into their process for approving and overseeing external provision.

Boards of Governors should obtain assurance that:

- external providers are assessed consistently;
- regulated activity is identified appropriately;
- staff understand that supervision can no longer be relied upon as an exemption;
- the necessary safeguarding and vetting assurances are obtained and recorded;
- the programme of offer from the provider is in line with departmental policies and guidance; and
- concerns arising during external provision are reported and acted upon.

The checklist is intended to support proportionate decision-making and should not result in the unnecessary cancellation of valuable external or voluntary provision. Its purpose is to ensure that external provision is commissioned and delivered safely and that the appropriate statutory safeguards are in place.

Please note that the EA or CCMS will ensure that all required checks are in place for external providers that are contracted by them directly to deliver services to schools and other educational settings within their remit. If applicable, you may wish to verify that these are in place.

It is also important that the external providers are aware of your individual setting safeguarding policies and procedures.

The central message is:
Assess the activity – obtain assurance from the external provider – safeguard the delivery within the setting.

Please bring this and the attached checklist to the attention of governors, management committees, the Designated Teacher and Deputy Designated Teacher(s), staff who commission or arrange external provision, and any other relevant personnel.

External Providers Working with Children and Young People – Regulated Activity Flowchart and Decision-Making Checklist

Regulated activity is work that a barred person must not do.

The Department of Health has provided the following guidance documents that provides information on the scope of Regulated Activity in relation to children and vulnerable adults as defined in the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, as amended by the Protection of Freedoms Act 2012 and the Crime and Policing Act 2026. These notes set out the law in Northern Ireland.

Regulated Activity in relation to Children

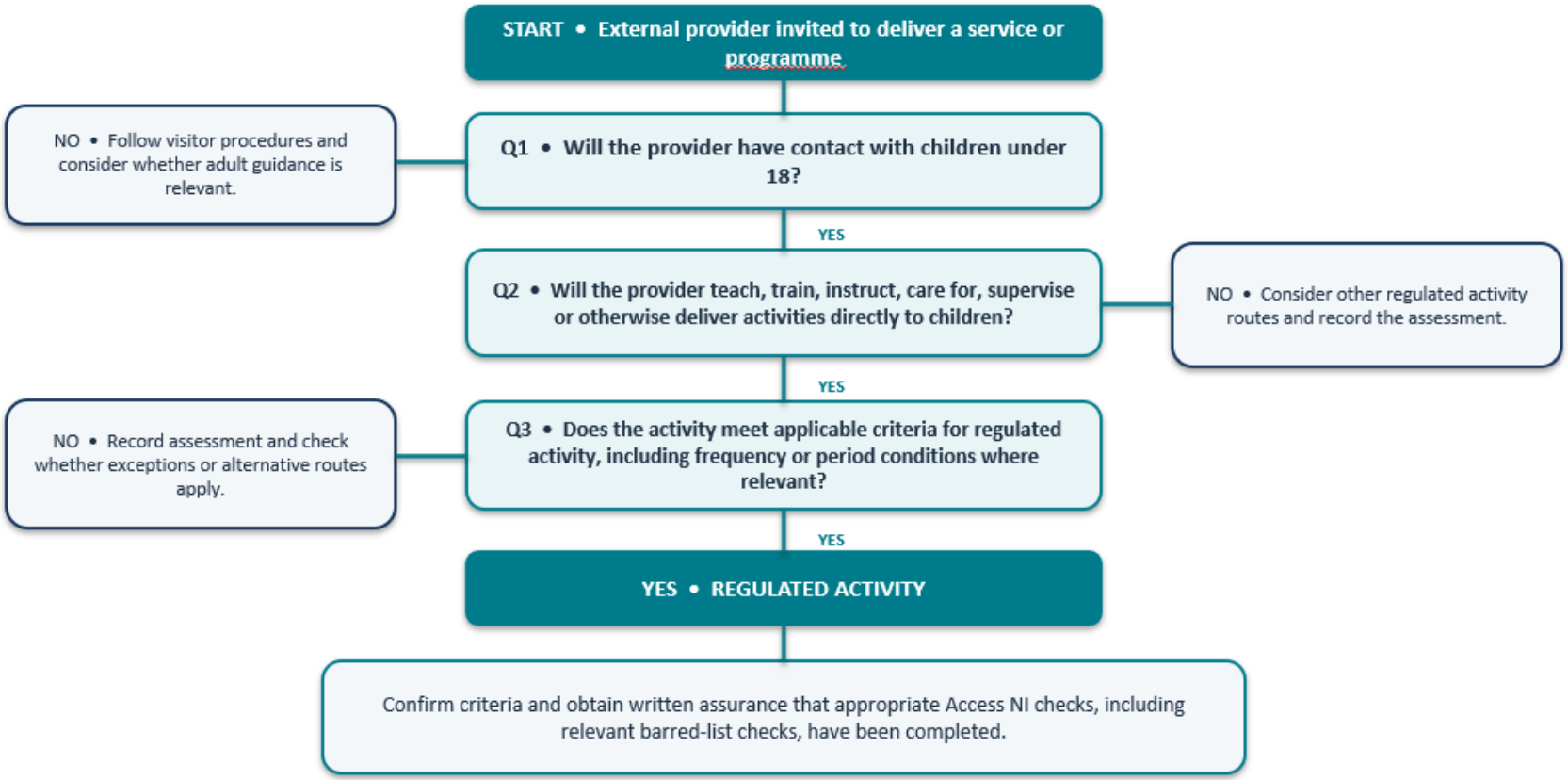
Regulated Activity in relation to Adults

The following screening tool is to assist you when making decisions in respect of Regulated Activity involving children and young people under the age of 18 and can be applied in those settings where there may be young people aged 18+ in receipt of personal care etc

The checklist is a sample document that aims to assist you with considering and recording any decisions – please feel free to tailor it to meet the needs of your setting.

REGULATED ACTIVITY SCREENING FLOWCHART

External providers and visitors (invited Directly by Schools/ Education Settings) delivering services or programmes in education settings



IMPORTANT • Initial screening only; not the sole basis for determining vetting requirements.

External Provider Safeguarding Checklist

Provider Details

Organisation/Provider: _____

Main Contact: _____

Activity/Programme: _____

Person(s) Delivering Activity: _____

Children/Young People Involved: _____

Date(s): _____

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1. Initial Consideration

☐ The activity involves direct work with children and young people.

☐ The provider and individuals delivering the activity have been identified.

☐ Any one-to-one, online or small-group contact has been considered.

☐ The activity is appropriate for the age and needs of the children and young people involved.

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2. Safeguarding and Vetting Assurance

☐ The provider has confirmed that safeguarding arrangements are in place.

☐ The provider has confirmed in writing that appropriate recruitment and vetting checks have been completed where required.

☐ Where the role constitutes regulated activity, written assurance regarding Access NI and barred-list checks has been obtained.

☐ The provider understands how to report safeguarding concerns to the school/setting.

☐ The provider understands that concerns must be reported immediately and confidentiality cannot be promised where there is a safeguarding concern.

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3. Safe Programme Delivery

☐ Any sensitive content has been discussed and agreed in advance.

☐ Appropriate supervision and support arrangements are in place for pupils.

☐ Relevant school procedures (safeguarding, behaviour, emergency arrangements) have been shared with the provider.

☐ Any additional needs, reasonable adjustments or support requirements have been considered.

Approval

Does the activity constitute regulated activity?

☐ Yes ☐ No ☐ Advice Required

Have appropriate safeguarding assurances been received?

☐ Yes ☐ No

Decision

☐ Approved

☐ Approved subject to conditions

☐ Not approved

Comments/Conditions:

Approved by: _____

Role: _____

Date: _____

Review date (if required): _____