

Independent Scrutiny in Safeguarding

A Practical Guide for Organisations





About This Guide

Organisations seek independent scrutiny for different reasons. Some want assurance that their existing safeguarding systems are sound. Others recognise gaps or vulnerabilities and need expert guidance to strengthen their approach. Many are motivated by a genuine desire to achieve better outcomes for the people they serve.

Whatever the starting point, effective engagement is guided by principles that help ensure independent scrutiny is ethical, thorough and constructive.

This practical guide explains independent scrutiny, when an organisation may benefit from external oversight and what supports best-practice engagement. It considers due diligence, leadership commitment, the scope and different forms of scrutiny, and the importance of an ethical, impartial and constructive process. It also provides practical questions for boards and organisational leaders.

The guide is intended for boards, executives, governance leaders and people with responsibility for safeguarding across faith-based institutions, education, charities, not-for-profit organisations and community service providers.

What is Independent Scrutiny?

Independent scrutiny is an objective examination of an organisation's safeguarding arrangements by a person or body with appropriate expertise and sufficient independence from the systems and activities being examined.



Kooyoora's Approach to Independent Oversight

Kooyoora provides independent oversight that is ethical, impartial and centred on safeguarding outcomes, not reputation management.

Kooyoora takes time to understand each organisation, including its governance arrangements, responsibilities, risk profile and safeguarding context. This provides a sound basis for examining current systems and practices, identifying strengths and gaps, and recommending practical improvements.

The scope of each engagement is clearly defined and tailored to the organisation's circumstances.

Throughout the process, Kooyoora maintains the independence and neutrality needed to provide a credible external perspective.

Kooyoora's role is not to endorse or certify an organisation, but to provide an impartial perspective that supports stronger safeguarding practice.



Independent Scrutiny: What It Is and What It Isn't

Independent scrutiny is most effective when its purpose and limits are clearly understood from the outset.

What It Is

- Guided by due diligence and a clear process
- Provides an objective assessment of safeguarding systems
- Identifies strengths and gaps
- Offers recommendations for improvement
- Supports transparency and accountability
- Encourages continuous learning and reflection
- Helps reduce the risk of harm to children and adults at risk
- Promotes honest engagement from leadership
- Supports organisational growth and safeguarding maturity
- Maintains neutrality and independence

What It Isn't

- Not an endorsement or approval
- Not a certification of safety
- Not a tool for reputation management
- Not a guarantee against future issues
- Not a judgement on past failures
- Not a one-off exercise, as safeguarding is ongoing
- Not a verdict on the organisation's past or present performance



Why Your Organisation May Seek Independent Oversight

Seeking independent oversight can demonstrate organisational maturity and a genuine commitment to better safeguarding outcomes.

Independent oversight may be useful when an organisation:

- wants assurance that its safeguarding systems are sound
- has identified gaps, vulnerabilities or emerging concerns
- is reviewing its governance, policies or practices
- wants to strengthen safeguarding culture and capability
- values an objective external perspective
- is committed to transparency and continual improvement

Independent Scrutiny Begins with Due Diligence

When an organisation seeks external review or oversight, the independent body's first responsibility is to undertake appropriate due diligence. This helps ensure the scrutiny is grounded, proportionate and responsive to the organisation's circumstances.

This may involve:

- understanding the organisation's structure, governance and risk profile
- reviewing safeguarding policies, procedures and past practice
- identifying known or emerging concerns
- assessing whether the proposed scrutiny is clear, feasible and in good faith



Leadership Commitment Matters

Independent scrutiny is most useful when organisational leaders are willing to engage openly with the process and consider what the findings may reveal.

This means being prepared to provide access to relevant information, listen to different perspectives and respond constructively to recommendations. It also requires sufficient time, resources and authority to act on what is learned.

Leadership commitment does not require an organisation to have everything right. It requires honesty, openness and a genuine willingness to improve.

Safeguarding Is Never Complete

Safeguarding arrangements need to evolve as organisations, communities, risks, legal requirements and expectations change. What works well today may need to be reviewed and strengthened over time.

Independent scrutiny can help organisations step back from established ways of working, consider external perspectives and identify opportunities to build internal capability.



What an Organisation Can Engage an Independent Body to Do

The approach will depend on what the organisation needs to understand. An organisation may engage an independent body to undertake:

- a broad assessment of safeguarding across the organisation
- focused scrutiny of a policy, process or area of risk
- a thematic examination of several cases or concerns
- scrutiny of governance or organisational culture
- periodic or ongoing independent oversight

The organisation remains responsible for its safeguarding arrangements and for acting on any findings or recommendations.

How Independent Scrutiny Differs from Other Processes

These processes serve different purposes:

- **Independent scrutiny** considers the effectiveness of safeguarding arrangements and opportunities for improvement.
- **An investigation** examines specific allegations, conduct or events.
- **An audit checks** practice or documentation against defined standards or requirements.
- **Regulatory oversight** is undertaken by an authorised regulator within its statutory responsibilities.

One process may identify the need for another, but they are not interchangeable. The right approach depends on the purpose, circumstances and responsibilities involved.



Questions Before Engaging an Independent Body

Boards and organisational leaders should ask:

- What do we need to understand or improve?
- Is the proposed scope clear and achievable?
- Does the independent body have appropriate expertise?
- How will its independence be maintained?
- Are there any actual or perceived conflicts of interest?
- What information and access will be required?
- Who will receive and consider the findings?
- Are sufficient resources available to respond?

Clear expectations from the outset help support an independent and useful process.

Scrutiny Should Be Constructive

Independent scrutiny works best when organisations approach the process openly, rather than defensively or as a reputational exercise.

The aim is to strengthen safeguarding systems, build capability, support accountability and reduce the risk of harm.

A constructive process requires clarity, respect and a shared commitment to better outcomes for children, adults at risk and the wider community.



Responding to Findings

Findings can be challenging, particularly when they highlight areas that need attention. Taking time to understand what they mean is an important first step.

Organisations should:

- identify priorities and immediate actions
- agree who will lead each response
- provide the support and resources needed
- monitor progress and keep leaders informed
- explain any recommendations that are not adopted

What matters is how the organisation responds, learns and carries the work forward.

A Mature Approach to Safeguarding

Inviting independent scrutiny is not a sign of weakness. It demonstrates a willingness to reflect honestly, learn and continue improving.

No organisation has every safeguard perfected. What matters is a sustained commitment to better outcomes for the people its systems are intended to protect.



Independent Scrutiny Readiness Checklist

- We have identified why scrutiny is needed
- The proposed scope is clear and achievable
- Leadership supports the process
- Relevant records will be accessible, and key people will be available
- Independence and conflicts of interest have been considered
- Appropriate expertise has been identified
- Responsibility for considering and responding to findings is clear
- Resources are available to act on recommendations
- Progress will be monitored and reported

Keeping Improvement on Track

Responding to findings is not a one-off task. Boards and leaders should remain informed about progress and whether changes are working as intended.

This may involve:

- setting realistic timeframes
- reviewing progress at agreed intervals
- checking that actions have led to meaningful change
- revisiting areas where risks or circumstances have changed
- sharing relevant learning across the organisation

Ongoing attention helps turn recommendations into lasting improvement.



How Kooyoora Can Assist

Kooyoora can work with your organisation to develop an approach that reflects its governance structure, responsibilities, risks and circumstances.

This may include a broad assessment, focused scrutiny of a particular area or ongoing independent oversight.

Kooyoora brings an ethical, impartial and practical approach, with a clear focus on stronger safeguarding systems and better outcomes for the people your organisation serves.

Contact Kooyoora to discuss what independent oversight could look like for your organisation.