The Girls' Day School Trust

Safeguarding Procedures
September 2019

Index **Page No**

Part A: The Practice of Safeguarding **3**

Key Definitions **4**

A1. Identifying and Responding to Pupils at Risk of Harm **5**
Identifying and Recognising Abuse 5
Categories of Abuse 6
Children Missing from education 9
Peer-on-peer abuse 10
Sexual violence and sexual harassment between children 11
Child Sexual Exploitation 12
Child Criminal Exploitation 13
Domestic Abuse 14
FGM and 'Honour Based' Violence 15
Impact of Abuse 17
Historical Abuse 17
Responding to Safeguarding Concerns 17
Multi-Agency Policy and Practice 18
Duty to Report Concerns about the Management of Safeguarding 20

A2. Confidentiality, Information Sharing and Consent **21**
Record Keeping 22

A3. Code of Conduct: Promoting Safe Practice **24**
Guidelines on Acceptable Behaviour of Staff and Volunteers 25
Physical Contact between Staff and Pupils 26
Confidentiality 28
Behaviour Management 29

Appendices
A1. GDST Record of Safeguarding Concern 33
A2. Sources of Support for Staff and Volunteers 35
A3. Role of the Designated Safeguarding Lead 36

Part B: The Management of Safeguarding **39**

B1. Safeguarding Strategy Statement **40**
Relevant Guidance 41

B2. Roles and Responsibilities **43**

B3. Safeguarding Communication Plan **49**

B4. Related Safeguarding Procedures **51**
Anti-Bullying 51
Child Protection and Online Safety 51
Radicalisation and violent extremism 52
School attendance, joining and leaving, action on absence, going missing 54
Looked after children and previously looked after children 56
Safeguarding on School Trips 57
School security 58

B5. Preventing Unsuitable People from Working with Children **59**
DBS Disclosures 59
Other Checks, Maintenance of the Single Central Record and Staff Files 63
Specific Categories of staff, workers and volunteers 73

B6. Allegations against Staff/Volunteers **82**
Duties as an employer and an employee 82
Initial considerations 82
Supporting those involved 84
Managing the situation and exit arrangements 85
Specific actions 89

Appendices
B1. Useful Definitions 91
B2. Illustrative Indicators of Pupils 'In Need' 93
B3. Body map 95
B4a. Agreement to Work in Accordance with GDST Safeguarding and Child Protection Policy and Procedure 97
B4b. Agreement to Work in Accordance with GDST Safeguarding and Child Protection Policy and Procedures (simplified version) 98
B5. Guidelines for Sport 99
B6. Guidelines for the Arts 101
B7. Checklists of staff safeguarding checks 103
B8a. Checklist of DBS requirements by staff category 114
B8b. Summary of pre-recruitment checks 117
B9. Contractors' Safeguarding Leaflet 119
B10. Childcare Disqualification Declaration Form 120
B11. Trust Office Safeguarding Procedures 121
B12. Guidance on drafting a protocol for visiting speakers 122
B13. Checking for spy cameras – notes of guidance 123

Part A: The Practice of Safeguarding

Key Definitions

Safeguarding — This is broader than child protection, and includes protecting children from maltreatment; preventing the impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Local Safeguarding Partners — The three local safeguarding partners (the local authority, a clinical commissioning group for an area within the local authority, and the chief officer of police for a police area in the local authority area) make arrangements to work together with the appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. They have a shared and equal duty to work together to safeguard and promote the welfare of children. They should make arrangements to allow schools to be fully engaged, involved and included in this process. Detailed guidance on these arrangements can be found in *Working Together to Safeguard Children*.

LADO — Local Authority Designated Officer(s) for Child Protection. Each local authority should have designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children. The term 'LADO' in this document is used for convenience to designate these local authority designated officer(s) or other appropriate first point of contact for child protection concerns, whatever terminology the local safeguarding partners may use.

A full list of key terms is set out in Appendix B1.

A1. Identifying and Responding to Pupils at Risk of Harm

Identifying and Recognising Abuse

School staff who have day-to-day contact with pupils are particularly well placed to observe outward signs of abuse such as changes in behaviour or developmental concerns. Staff are under an obligation to ensure that they are **alert** to signs of abuse and neglect, and to **question** the behaviour of children and parents/carers without necessarily taking what they are told at face value. They should make sure they know where to turn to if they need to **ask for help**, and that they **refer** concerns to the Designated Safeguarding Lead if they suspect that a child is at risk of harm or is in immediate danger. Safeguarding children is everyone's responsibility, and it is better to help children as early as possible before issues escalate and become more damaging. It is important not to let other considerations, like the fear of damaging relationships with adults, get in the way of protecting children from abuse and neglect. If you have concerns to report, you should view this as the beginning of a process of enquiry, not an accusation.

The identification of child abuse is almost always arrived at through piecing together a variety of factors as in a jigsaw puzzle, rather than there being one definite sign, symptom or injury. It is dangerous to assemble check lists of indicators of abuse in the belief that this will make identification simple and straightforward. The key is always one of context, for example, the site and type of injury, the age and development stage of the child, how the parent(s) said the injury happened, what the child said and so on. *Many children will exhibit some indicators of abuse at some time and the presence of one or more should not be taken as proof that abuse is occurring.* However, if you suspect abuse has occurred you must always speak to the Designated Safeguarding Lead.

There are some common areas, which may indicate the possibility of abuse. Remember though that they should never be taken on their own as absolute proof that abuse has occurred:
- Does their explanation tally with the injury sustained?
- Did they seek medical help within reasonable time scale?
- Is there a pattern of recurring injuries/problems with the child?
- What is the parents' general attitude towards the child?
- How do they react to you as a professional?

Bear in mind that some children may be more vulnerable to abuse. Children with disabilities, for instance, may be especially vulnerable because they may have an impaired capacity to resist or avoid abuse, or may have speech, language and communication needs which make it difficult to tell others what is happening.

Diagnosing child abuse is not a simple process. We know that child abuse does occur, and we must be willing, indeed have a duty, to take action to protect children from abuse. An awareness of possible indicators of child abuse means that we are more likely to be able to recognise it and help the child. Sometimes children may present with signs and symptoms of abuse. At other times there will not be obvious indicators. Some information on the signs of abuse are included in the school *Safeguarding Policy* (para 3.5). Fuller notes are set out below:

Some injuries are highly suggestive of abuse:
- Hand-slap marks
- Grip marks, often visible if a child has been shaken and sometimes the only physical indicator of sexual abuse if a child has been forcibly held by the abuser
- Bruising in unusual positions, including the genital area
- Black eyes, often caused by direct blow, although they may occur from an accidental bang on the bridge of the nose or forehead
- Bite marks, often evidence of bruising, and teeth marks
- A torn fraenum (piece of skin which attaches inside upper lip to gum) may be the result of a direct blow or of an object being forced into the mouth

• Multiple fractures or fractures of varying age
• Poisoning
• Injuries to the genital or rectal area, including unexplained soreness or bleeding, sexually transmitted diseases and pregnancy
• Poor physical care, including inadequate hygiene, inappropriate dress, constant hunger and lack of attention to medical need
• Restricted growth and development may be a result of non-organic failure to thrive

Similarly, children's behaviour may give clues that they are or have been abused (although it should be remembered that children show signs of distress for other reasons too, e.g. divorce of parents, death of a family member):

• A fear of adults generally or certain adults in particular
• Poor peer relationships with other children and an inability to make friends
• Aggression and acting-out behaviour
• Social isolation and withdrawal
• Pseudo-maturity
• Frozen awareness (a combination of lack of expression and watchfulness)
• Detachment
• Sleep disturbance
• Running away
• Eating disorders
• Psychological problems
• Psychosomatic complaints (that is, illness caused by hidden fear or anxiety)
• Low attainment or a sudden drop in school performance
• Self destructive behaviour, including substance abuse and suicide

Contact with parents (unless they are suspected of abuse) is an important component of recognising abuse – their attitudes, responses and explanations must be evaluated as part of the jigsaw of recognition. Children have the right to be protected from abuse. This applies regardless of parental circumstances and any sympathy one feels for the parents concerned.

Safeguarding incidents and/or behaviours should also be considered within the context in which they occur – that is, the wider environmental factors in a child's life that may be a threat to their safety and/or welfare. Children's social care assessments should consider such factors so it is important to provide as much information as possible as part of any referral process. This will allow an assessment to consider all the available evidence and the full context of any abuse.

Categories of Abuse

Staff may become alerted to the possibility of child abuse by:
• Noticing signs and symptoms of abuse
• Allegations made by another person
• An admission from someone who says they are harming a child
• A child telling them or showing them that they have been mistreated.

The lists below are neither exclusive nor exhaustive.

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, or deliberately induces, illness in a child.

Possible signs

- Fractures or any bruising on a baby
- Bruises and scratches to face and head
- Pinch marks or bite bruises
- Bruising around both eyes simultaneously
- Torn fraenulum (skin linking upper jaw and lip)
- Fingertip bruising on front and back of chest (gripping)
- Finger or hand marks on any part of the body
- Ligature marks on neck, arms, or legs
- Cigarette burns
- Linear shaped burns or bruises (e.g. iron, radiator)
- "Non-cascade" scalds
- Head injury, may be no outward sign of injury
- Poisoning
- Bald patches
- Recurrent unexplained/untreated injuries or lingering illness

Possible behavioural indicators of physical abuse

- Explanation inconsistent with injury
- Refusal to discuss injuries
- Fear of going home or parents being contacted
- Arms and legs kept covered in hot weather or fear of undressing
- Aggressive bullying behaviour
- Frozen watchfulness/cowering/flinching at sudden movements
- Withdrawal from physical contact
- Fear of medical help
- Admission of excessive punishment
- Running away
- Self destructive tendencies

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 children 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), casing children frequently to 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.

Possible signs

- Speech delay, poor verbal ability, lack of communication skills
- Bed wetting, soiling (without physical cause)
- Lack of concentration, learning problems
- Unreasonable fear of new situations
- Eating disorders (over eating or under eating)
- Inappropriate emotional responses to stressful situations
- Low self-esteem
- Self-mutilation
- Alcohol, drug, solvent abuse

Possible behaviour

- Over-reacting to mistakes
- Obsessive behaviour (e.g. rocking, twisting hair, sucking thumb)
- Withdrawal from relationships with other children
- Fear of parents being contacted
- Extremes of passivity or aggression
- Attention seeking
- Chronic running away
- Compulsive stealing, scavenging for food or clothes
- Impaired capacity to enjoy life

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 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.

Possible signs

- Cries hysterically when nappy is changed
- Wetting and soiling themselves
- Sudden drop in school performance/poor concentration
- Obsessed with sexual matters as opposed to normal exploration
- Changes from being happy and active to being fearful and withdrawn
- Unexplained sources of money/gifts
- Urinary infections, bleeding or soreness in the genital/anal areas
- Vaginal discharge – vaginal warts
- Soreness and bleeding in the throat
- Chronic ailments e.g. stomach pains, headaches without obvious cause
- Eating disorders
- Becomes severely depressed
- Has a poor self-image
- Uses alcohol/drugs to excess
- Not allowed to have friends around or go out on dates
- Fearful of undressing for physical education
- Venereal infection
- Pregnancy

Possible behaviour

- Overly compliant behaviour
- Behaves in a sexually inappropriate way in relation to their age
- Withdrawn and unhappy, insecure and “clingy”
- Plays out sexual acts in too knowledgeable a way for their age
- Say themselves that they are bad or wicked
- Arriving early at school and leaving late with few, if any, absences
- Excessive masturbation – exposing themselves
- Drawings of sexually explicit nature
- Attempts to sexually abuse another child
- Recurring nightmares and/or fear of the dark

• Had a “friend who has a problem” and then tells about the abuse of “a friend”
• Self-mutilation/attempted suicide
• Running away
• Prostitution

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, shelter and 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); ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Possible signs
• Unkempt appearance, poor personal hygiene
• Poor skin/hair condition
• Drop through height/weight centiles
• Small stature (where not a family characteristic)
• Constant tiredness
• Repeated accidents
• Untreated medical conditions
• Inappropriate clothing
• Constant hunger
• Frequent lateness or non-attendance at school
• Accidental self-poisoning
• Severe tantrums
• Isolation within school
• Lack of trust
• Unexplained tummy pains
• Eating problems
• Fear
• Self harm
• Depression or signs of withdrawal or regression

Possible behaviour
• Inability to form friendships/relationships
• Pseudo-mature or sexually explicit behaviour
• Air of detachment – “don’t care” attitude
• Chronic running away
• Compulsive stealing
• Scavenging of food and clothes
• Low self-esteem
• Neurotic behaviour (e.g. rocking, thumb sucking, hair twisting)
• Inability to make social relationships
• Tendency to destroy things

Children missing from education

Regular school attendance is crucial for children educationally, but also important for their social and emotional development. Furthermore, a child going missing from an education setting, particularly repeatedly, can act as a vital warning sign of a range of safeguarding issues. This may include abuse and neglect and such children are at risk of being victims of harm, exploitation or radicalisation. It may also

indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. Staff should treat prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly.

It is a regulatory requirement for EYFS setting to have a written procedure to be followed in the event of a parent and/or carer failing to collect a child at the appointed time, or in the event of a child going missing at, or away from, the setting (Statutory Framework 3.73).

Promoting School Attendance
Schools should promote good attendance. Contact should be made with parents on the first day of an unauthorised absence, and explanations for absence should be followed up rigorously when the child returns to school. Any concerns regarding these explanations should be reported to the Head/DSL (depending on the nature of the explanation).

Requests for leave of absence should be very carefully considered by the Head and only granted in exceptional circumstances, in accordance with the GDST attendance and admissions registers guidance on the GDST staff intranet.

Monitoring Absence
Class teachers and tutors should review the attendance record of the pupils for whom they are immediately responsible on a regular basis. Extended, regular or patterned absence from school can be an indicator of a wellbeing or safeguarding issue, and should always be followed up. The attendance of pupils with known welfare and attendance concerns should be monitored particularly closely.

Types/patterns of absence of particular concern (e.g. those associated with FGM or forced marriage) should be covered in the school's regular safeguarding updates and further information can be found via links in *Keeping Children Safe in Education*.

The nature of action to be taken will depend on the age of the child and individual circumstances, but may well involve:

- An initial confidential discussion with the pupil herself
- A discussion with parents
- A discussion with the year group/key stage lead, pastoral deputy, nurse or DSL

Any concern and action taken should be recorded in writing and a note placed on the pupil file.

Peer-on-peer abuse

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). It can take various forms, including: serious bullying, relationship abuse, domestic violence, child sexual exploitation, youth violence, harmful sexual behaviour (see below), and/or gender based violence.

Abuse by peers should be taken as seriously as abuse perpetrated by an adult – don't be dismissive or set high thresholds. Peer on peer abuse, including verbal abuse, should be recognised as a potential safeguarding issue and never be tolerated or passed off as horseplay, teasing or 'banter'. The threshold for dealing with an issue of pupil behaviour or bullying under the safeguarding procedure is, subject to local specifics as in any other case, when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. Also bear in mind that there may be a risk to young children / young people other than the current victim.

In cases of bullying (especially sexist, sexual and transphobic bullying due to the potential seriousness of violence), schools must always consider whether safeguarding processes need to be followed.

Key principles:

- Educate pupils to recognise and respond appropriately to peer abuse
- Investigate any allegation of peer abuse promptly and thoroughly
- Implement the safeguarding and anti-bullying policies and procedures
- Seek advice from statutory agencies, and be prepared to make a referral if the case meets the threshold set by the local safeguarding partners
- Follow the advice for practitioners in *What to do if you're worried a child is being abused*
- A co-ordinated multi-agency approach is required
- Multi-agency assessment should be carried out in each case
- The needs of young people who abuse should be considered separately from the needs of the victim – and schools should be alert to the fact that a child who has harmed another child may themselves be a victim
- Good record keeping of related conversations, meetings, communications and any intervention is essential.

A young abuser should be the subject of a child protection conference (CPC) if s/he is considered personally to be at risk of continuing significant harm.

Sexual violence and sexual harassment between children

Detailed advice on this issue is available in the DfE publication *Sexual violence and sexual harassment between children in schools and colleges*, and guidance on managing reports can be found in Part 5 of *Keeping Children Safe in Education*. Key points have been summarised below. However, the guidance itself should be referred to for more detailed information.

What is meant by sexual violence and sexual harassment?

- Sexual violence and sexual harassment can occur between two children **of any age and sex**, or between groups of children
- Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment
- Children with SEND, and pupils who are LGBT or perceived to be LGBT, are likely to be more vulnerable
- Sexual violence refers to rape, assault by penetration or sexual assault
- Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying pictures or photos of a sexual nature; and online activity including sharing of images or video (sexting) or making inappropriate sexual comments (this list is not exhaustive)
- Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive and violent
- When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered

A whole school approach

- Sexual violence and sexual harassment should be included in the school's broader approach to safeguarding and should be clear and easy to understand for staff, parents and pupils
- It should be clear to all that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Sexual violence and sexual harassment should be included in staff training and age-appropriate PSHE

Initial response to reports of sexual violence and sexual harassment

- Schools should prepare for possible incidents, for instance by reviewing the specialist support potentially available

- Reports of sexual violence are often complex and require difficult decisions to be made – online concerns can be especially complicated
- Staff should not assume that someone else is dealing with the incident, and should discuss concerns with the DSL
- The initial response to a disclosure is important and schools should ensure the victim is taken seriously and supported. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report
- Schools should act in the best interests of the child. The needs and wishes of the child should be paramount (along with protecting the child) in any response
- General safeguarding principles apply in responding to incidents. Where an incident occurs off site, the school's duties remain the same
- Decisions are ultimately for a school to make on a case-by-case basis, with the DSL taking a leading role, and supported by other agencies such as children's social care or the police
- Schools should make a risk and needs assessment in cases of a report of sexual violence (the need for a risk assessment following a report of sexual harassment should be decided on a case by case basis). The assessment should consider the victim, alleged perpetrator and other children at the school, be recorded and kept under review.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (*Working Together to Safeguard Children*)

Child sexual exploitation is a crime with devastating and long lasting consequences for its victims and their families. Any child, in any community may be vulnerable to CSE: it affects both boys and girls from all ethnic groups. Some key points to bear in mind are:

- It can affect any child or young person under the age of 18, including 16 and 17 year olds who can legally consent to have sex
- It can involve force, violence or threats of violence, or enticement-based methods of compliance
- It may occur without the victim's immediate knowledge (e.g. through posting images on social media)
- It can be perpetrated by individuals or groups, males or females, adults or children
- It can be a one-off incident or a series of incidents, and range from opportunistic to complex organised abuse
- The power imbalance typical of CSE may manifest itself in different ways: for example age, gender, sexual identity, cognitive ability, physical strength, status etc.

Children rarely self-report CSE, so it is important that practitioners are aware of potential indicators of risk, including:

- Unexplained gifts or new possessions
- Association with other young people involved in exploitation
- Isolation from peers/social networks
- Relationships with controlling or significantly older individuals or groups
- Concerning use of the internet and other social media
- Excessive receipt of texts/phone calls, multiple callers
- Inappropriately sexualised behaviour for age, sexually transmitted infections or pregnancy

- Changes in emotional well-being;
- Increased secretiveness
- Misuse of drugs and alcohol
- Going missing for periods of time or regularly coming home late; and
- Regularly missing school or education or not taking part in education.

However CSE can occur without any of these risk indicators being obviously present.

Detailed non-statutory guidance on CSE can be found at
https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners
Some informative short films on CSE have been made available by the University of Bedfordshire at
https://www.beds.ac.uk/ic/films

Child Criminal Exploitation (County Lines)

In July 2017 the DFE produced further guidance in respect of criminal exploitation with the expectation that all frontline school staff will become familiar with the guidance. It provides:

- a definition of the term 'county lines exploitation'
- describes the impact on young people
- describes characteristics of children who may be vulnerable
- sets out signs to look out for and how to respond
- provides useful case studies

County Lines Exploitation is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated phone lines. It involves child criminal exploitation as the gangs use children and vulnerable people to move drugs and money. The gang may establish a base by taking over a vulnerable adult's home. Issues involved include drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons.

It can affect a child or young person or vulnerable adult and is still exploitation even if the activity appears consensual. It can involve force or enticement-based methods together with threats of violence or actual violence. It can be perpetuated by individuals or groups, males or females and young people or adults. It typically involves some form of power imbalance, including gender, cognitive ability, physical strength, status and access to economic or other resources.

Whilst young people aged 15-16 years old are most commonly exploited, children as young as 12 are known to be exploited by gangs to act as drug couriers. Both males and females are exploited, with social media sometimes used to make the initial contact.

Factors that heighten a person's vulnerability include:

- having poor experience of neglect, physical and/or sexual abuse
- lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- social isolation or social difficulties
- economic vulnerability
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a physical or learning disability
- having mental health or substance misuse issues
- being in care (particularly those in residential care and those with interrupted care histories)

Some indicators of 'County Lines' involvement and exploitation include:

- persistently going missing from school or home and/or being found out-of-area
- unexplained acquisition of money, clothes or mobile phones
- excessive receipt of texts/phone calls
- relationships with controlling/older individuals or groups
- leaving home/care without explanation
- suspicion of physical assault/unexplained injuries
- parental concerns
- carrying weapons
- significant decline in school results/performance
- gang association or isolation from peers or social networks
- self-harm or significant changes in emotional well-being

If you are concerned about a child you should follow your local safeguarding partner procedures. If you believe a child is at immediate risk of harm you should contact the police.

The DfE guidance Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance provides a useful flowchart to guide your thinking.

NSPCC Childline and Mind can be sources of support for young people.

Domestic Abuse

Domestic abuse can be defined as 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial, and
- emotional

It is estimated that one in five children are exposed to domestic abuse. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Children witnessing domestic abuse is recognised as 'serious harm' in law. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse can also be a sign that children are suffering another type of abuse or neglect.

Domestic abuse can be difficult to identify as children often learn to keep their feelings to themselves and may feel like violence in their home life must be kept secret. However, the stress of living with abuse may lead some visible indicators which include:

- aggression or bullying
- withdrawal
- attention seeking
- anti-social behaviour
- depression or anxiety
- difficulties with school work
- eating disorders
- drug or alcohol abuse

- constant colds, headaches, mouth ulcers, asthma, eczema

Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Young people experience the highest rates of domestic abuse of any age group, and 95% of young people experiencing abuse within their intimate relationships are female[1].

National Domestic Abuse Helpline 0808 2000 247 (24 hours)
http://www.nationaldomesticviolencehelpline.org.uk/

Women's Aid website for children and young people: http://thehideout.org.uk/

Female Genital Mutilation (FGM) and other forms of so-called 'honour based' violence

So-called 'honour based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community. This includes FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If staff have a concern regarding a child that might be at risk of HBV they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and children's social care.

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK, as is taking a British national or permanent resident abroad for FGM or helping someone to do this. It has been estimated that over 20,000 girls under the age of 15 are at risk of FGM in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM. Most of the women and girls from practising communities live in the major UK cities, including London, Manchester, Sheffield, Liverpool, Birmingham and Cardiff. The girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to 'heal' before they return to school. There are also worries that some girls may have FGM performed in the UK.

Schools have a legal duty to safeguard children at risk, and FGM is a form of child abuse with long-lasting harmful physical and emotional consequences. Girls who are threatened with, or who have undergone FGM may withdraw from education, restricting their educational and personal development. Any indications that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures in the Safeguarding and Child Protection Policy. In support of this provision, schools are advised to raise awareness of FGM among staff, ensure that sources of information and advice are available to both staff and pupils (including signposts for accessing additional help, e.g. the NSPCC's helpline, ChildLine services, and appropriate black and ethnic minority women's groups), include FGM in the curriculum in relevant classes, and create an open environment in which girls feel able to discuss such concerns without inhibition.

There is a range of potential indicators that a girl may be at risk of FGM, including:

- Being in a family where other members have undergone FGM
- Parents withdrawing the girl from PSHE or learning about FGM
- Parents planning to take the girl out of the country for a prolonged period
- A girl appearing anxious, depressed and withdrawn and her educational performance, aspirations or motivation declining

[1] SafeLives Children's Insights data. The full report can be found at http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse

- A girl confiding that she is to have a 'special procedure' or attend a special occasion to 'become a woman'

Further information on warning signs can be found in the statutory guidance at https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation

There is also a resource pack available: https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack/female-genital-mutilation-resource-pack

A leaflet provided by the Home Office: https://www.gov.uk/government/publications/female-genital-mutilation-leaflet

And guidance for schools produced by the National FGM Centre: http://nationalfgmcentre.org.uk/wp-content/uploads/2019/06/FGM-Schools-Guidance-National-FGM-Centre.pdf

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- not to reveal to anyone other than the Designated Safeguarding Lead that their enquires might be related to FGM, as this could increase risk to the pupil
- not to engage initially with the pupil's parents or family, or others within the community
- to alert the Designated Safeguarding Lead to their concerns immediately. This member of staff will then activate local safeguarding procedures, liaising with the police and children's or adults' social care. If a pupil has disclosed that she is at risk in this way, the case will still be referred to social care even if it is against the pupil's wishes. In all situations the girl should be offered counselling and medical help, and an assessment should be made of other related females who may be at risk.

For further information on what to do if there are concerns that a student may be at risk of or has undergone FGM, or if a student stops attending school, see Chapter 9 of the Multi-Agency Practice Guidelines.

From October 2015, it became a statutory duty on teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Unless a teacher has good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.[2]

Information on when and how to make a report can be found at https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Further information and support materials can be found at:

- https://www.gov.uk/government/collections/female-genital-mutilation
- NHS Choices http://www.nhs.uk/Conditions/female-genital-mutilation/Pages/Introduction.aspx
- Foundation for Women's Health Research and Development (FORWARD) at http://www.forwarduk.org.uk

Forced Marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional or psychological. Further information can be found in the statutory guidance and multi-agency guidelines (see p.35-6 for the role of schools and colleges).

[2] A factsheet on the new duty can be found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Other specific safeguarding issues

Guidance on other specific safeguarding issues (including fabricated or induced illness, faith abuse and teenage relationship abuse) can be found via the GOV.UK website – links can be found in *Keeping Children Safe in Education* Annex A. The TES website and NSPCC website are other good sources of information.

Impact of Abuse

Abuse in all its forms can affect a child at any age from nursery stage to sixth form. It is well documented that pupil performance and behaviour can be adversely affected. The effect can be so damaging that the consequences are felt throughout a person's life. For example, an adult who was abused as a child may be unable to, or have great difficulty in, sustaining stable trusting relationships or may develop an excessive and harmful use of drugs or alcohol. The adverse effects of abuse can be helped considerably by an appropriate response to handling disclosures by the professionals involved, therapeutic and/or professional support if required and, importantly, family support.

Historical Abuse

Reports of abuse that happened in the past still need to be reported in accordance with GDST procedures. A pupil reporting "historical abuse" may benefit from family support and may need specific therapeutic/professional help. In addition child protection agencies will need to consider whether or not to conduct a child protection investigation, as a crime may have been committed and other children with whom the alleged abuser is (or has been) living or working may have been abused or be at risk of significant harm.

Responding to Safeguarding Concerns

Taking Appropriate Action
Individual schools provide pupil support in a variety of ways, through comprehensive and effective pastoral care, specific support for pupils through the Special Educational Needs Coordinator (SENCO), whole school Anti-Bullying strategies, Personal Social and Health Education (PSHE) and Sex and Relationship Education (SRE) programmes, special whole school events, and specific intervention to meet the needs of individual pupils.

A safeguarding concern may come to the attention of staff/volunteers in a variety of ways, such as:

- A pupil may disclose that s/he is being abused at home, school or elsewhere;
- A staff member or volunteer may become suspicious that a child is being abused;
- A third party (e.g. another pupil, a parent/family member or colleague) may share their concerns with a member of staff/volunteer;
- A member of staff/volunteer may have general concerns about a pupil's health or wellbeing.

Responding to a disclosure/safeguarding concern
Staff must be aware that the way in which they talk to a child can have an effect on the validity of evidence which can be brought in any subsequent criminal proceedings.

Dos

- **Stay calm and listen carefully**
- Explain sensitively that you must inform the Designated Safeguarding Lead (use their name) so that s/he can make sure that they can be helped to stay safe. It is important for all pupils, including very young children, that they are reassured that the matter will *only be disclosed* to people who *need to know.* Guidance on confidentiality, information sharing and consent is set out in further detail below

- Allow the child to talk freely and listen without criticising
- Accept what the pupil says and do not ask for further detail
- Acknowledge how hard it was for them to tell you and show by voice tone and/or facial expression that you are taking their concerns seriously
- Keep questions to a minimum: only use questions if you have to make sense of what the child is trying to communicate to you
- Ask ONLY open questions e.g. "Tell me what has happened" **NOT** "did she/ he/ do *** to you". " Who did this" **NOT** "Did *** do this to you"
- Reassure the child that they were right to tell you, that it is not their fault and explain whom you will have to tell (the Designated Safeguarding Lead) and why
- When you are recording the child's account of events, where possible use the child's *exact* words and phrases even if these are childish words, or you think it is rude or inappropriate language
- Note any external signs of possible injury or neglect but do not undress or examine the child
- Report your concerns to the Designated Safeguarding Lead immediately and well before the end of the same school day.

Don'ts

- **Do not promise confidentiality** (or make any other promises you can't keep)
- Don't interrupt the child who is freely telling their account of what happened
- Don't put words into the child's mouth (i.e. finish the child's sentences for him/her)
- Avoid asking the child for details
- Avoid making assumptions about the pupil or their family
- Avoid jumping to conclusions or speculating about what happened or might have happened or making accusations
- Try to avoid an overly emotional reaction, such as expressing disgust, shock or disbelief
- Don't attempt to undress the pupil in order to examine him/her in an attempt to determine the nature of any injuries/neglect, or take images of a child's injury
- Don't collude with any other person in relation to concerns about the pupil's welfare or hold on to significant information about the pupil's welfare
- Don't confront the alleged abuser
- Don't burden the pupil with guilt by asking questions such as "why didn't you tell me before?"
- Don't interrogate or pressure the pupil to provide information
- Don't ask any potentially leading questions such as those that start with the words, how, what, when, where and why
- Don't criticise the alleged perpetrator, this may be someone they love
- Don't make promises that you cannot keep such as "I'll stay with you all the time" or "it will be alright now".

Staff should record any safeguarding concerns or disclosures, and report them immediately, well before the end of the same school day, to the Designated Safeguarding Lead. Clear communication arrangements must be in place for all staff working out of normal school hours to contact the Designated Safeguarding Lead and/or local child protection agencies.

It is not the role of the GDST (including Heads and the Designated Safeguarding Lead/s) to investigate suspected or alleged abuse; this is the role of the Police and Social Services.

Multi-Agency Policy and Practice

The GDST recognises the critical importance of actively contributing to multi-agency safeguarding policy and practice: *"Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to*

receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.[3]".

Wherever a concern is raised with the Designated Safeguarding Lead, they should, in consultation with the Head where possible, always consider seeking advice or guidance from Social Services, or other local agencies involved in the safeguarding and welfare of children (such as an educational psychologist or CAMHS). This may be the case where there is a serious child protection allegation, or where there is a general concern about a pupil's well-being and health.

Early Help Assessment (formerly CAF)
An early help assessment is undertaken when it appears a child and family would benefit from coordinated support from more than one agency. The assessment should identify what help the child and family need to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, SENCO, GP, family support worker and/or health visitor.

An Early Help Assessment is not a referral. The Designated Safeguarding Lead should discuss with Social Services whether it would be more appropriate to undertake an Early Help Assessment or to make an immediate referral.

Decision to refer to Social Services
When making the decision to make a referral to social services which could activate a child protection investigation, **advice to determine whether it is appropriate to obtain consent, or notify parents in advance of making the referral** and, if applicable, how to approach gaining consent of parents and pupils concerned, should be sought from the local child protection agencies, preferably Social Services. Advice can also be sought from the Legal Department at Trust Office. Any advice received should be recorded. This advice can be sought without revealing the child's identity and can help the Head decide whether or not to make a formal referral, and how to deal with the sensitive issue of consent. Generally, the consent of parents should be obtained before making a formal referral, unless to do so would place the child at significant risk of harm. **However, the decision as to whether, when and what to tell parents should be agreed in advance with Social Services**. Please also refer to the Seven Golden Rules of Information Sharing which deals with the issue of consent.

In the event of a school making a referral to Social Services, they should **agree with Social Services exactly what the child and parents will be told, by whom and when**. The Designated Safeguarding Lead should also ask to be kept informed of the timing of any strategy discussions between Social Services and the police, which will decide *whether and how to investigate*. The Designated Safeguarding Lead (accompanied by or in close liaison with the staff member who knows the child best) should be prepared to contribute to the strategy discussion on the basis of the school's knowledge of the child.

Unsatisfactory response from Child Protection Agencies
The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. The referrer should follow up if this information is not forthcoming. A record of each contact with Social Services, including the name of the officer with whom the School has spoken, and the date and time of the call, should be kept.

In the event of the school not being satisfied with the response, the Head should liaise directly with Social Services to try to resolve a more satisfactory outcome for the pupil concerned. Failing this, the Head should write to the Director of Children's Services. As a last resort, the Head should request the Chief Executive to write to the Chair of the local safeguarding partners, whose role is to help ensure that all agencies are working effectively and collaboratively together to safeguard children and that any barriers to effective multi-agency working are properly addressed.

[3] Working Together to Safeguard Children 2018 p.11

Duty to Report Concerns about the Management of Safeguarding

It is recognised that children cannot be expected to raise concerns in an environment where staff fail to do so. Where staff or volunteers reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise those concerns, and the duty of the senior leadership team to take them seriously. Staff and volunteers should be encouraged to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. The duty to report concerns about the management of safeguarding is part of the Code of Conduct and the whistleblowing procedure below can also be found in the Safeguarding Policy (section 9). It will also form part of staff induction training.

The member of staff or volunteer should bring their concerns to the attention of the Designated Safeguarding Lead, or in a case where the concerns relate to the actions or inaction of the Designated Safeguarding Lead, to the Head.

However, where a member of staff or volunteer reasonably believes these reporting routes to be inappropriate, or has reported concerns and no action has been taken, they should contact the Director of Legal at Trust Office or refer their concerns to children's social care directly. The NSPCC whistleblowing helpline is also available: tel. 0800 028 0285 (8am-8pm, Mon-Fri) email: help@nspcc.org.uk

A2. Confidentiality, Information Sharing, Consent and Record Keeping

In order to effectively safeguard children and enable intervention, secure and appropriate information sharing between agencies is essential. Often, it is only when information from different sources is put together that risks can be properly identified. All staff need to be clear about when to share information to help keep a child safe or promote a child's welfare.

Where you have reason to believe that a child may be suffering or may be at risk of suffering significant harm, you should always consider referring to social services in line with local safeguarding partner guidelines.

It is important to recognise that significant harm does not simply arise from deliberate abuse or gross neglect. It can also arise where a child is failing to thrive for no known reason, for example because they are suffering from an undiagnosed medical condition. If parents refuse to provide medical information or to seek medical help, again information sharing may be justified. Where you have concerns that the actions of some may place a child at risk of significant harm, it may be possible to justify sharing information with or without consent for the purposes of identifying people for whom preventative interventions are appropriate.

Seven Golden Rules of Information Sharing

1. Remember that the General Data protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.. In such cases it is recommended that advice is sought from the Legal Department.
4. Where possible, share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared. It is recommended that advice is sought from the Legal Department.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it, whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose. This record should include the date, time and name of person making the decision and details of any relevant advice from Social Services/other agencies. The note should distinguish between fact and opinion where possible.

Sources of Advice
If staff have a safeguarding concern or a concern about the well-being of a pupil, and are unsure about whether or how to share information appropriately, guidance should be sought from:

- Contacting children's social care (which can be on a no names basis) for advice
- The Legal Department at Trust Office
- Information Sharing: advice for practitioners providing safeguarding services July 2018
- What to do if you are worried a child is being abused 2015
- The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department

Specific guidance on confidentiality for **School Nurses** is contained in the Roles and Responsibilities: School Nurse section of these procedures.

Record Keeping

Good record keeping is essential for effective safeguarding practice and schools should therefore ensure that all concerns should:

- Be recorded as soon as possible and in any event within 48 hours,
- Clearly distinguish between fact and opinion
- Contain name(s), date, the event, any action taken and to be taken
- Be a record of what was said
- Contain details of any advice received from Social Services or other agencies and their details
- The Designated Safeguarding Lead must be informed. They will determine what information must be shared with which other staff and local agencies, in accordance with the Information Sharing and Consent guidance. The record should be updated to reflect who the information has been shared with, the basis for the decision to share, whether there was consent, and any advice obtained in relation to sharing the information
- Staff must be aware that their records may be used in criminal proceedings. Recording procedures need to be followed in conjunction with procedures relating to confidentiality, and information sharing requirements.

Secure storage, sharing and retention of sensitive personal information

All safeguarding and related pastoral care information concerning individual students should be recorded and held on CPOMS.

- Wherever possible safeguarding information and concerns should be recorded directly onto the online system
- Internal and external reports or documents received electronically or on paper should be scanned if necessary, uploaded onto CPOMS and the original destroyed or deleted
- Should it ever be necessary to retain a paper record it should be stored in a locked filing cabinet
- There is no need to upload records that predate the introduction of CPOMS onto the system. Legacy documentation should however be stored in a locked cabinet.

Safeguarding and sensitive pastoral information should only be shared internally via CPOMS. It is also possible to share CPOMS data securely with some external organisations. Should it be necessary to email a document containing safeguarding or sensitive pastoral information externally, the document should be encrypted or password protected. Passwords must be shared separately.

In terms of retention, all data on the safeguarding file potentially forms part of the important story that may be needed retrospectively for many years. **No records of safeguarding concerns should be destroyed before**

the conclusion of the Independent Inquiry into Child Sexual Abuse, led by Professor Alexis Jay, which began in July 2015 and is expected to continue until 2020.

A3. Code of Conduct: Promoting Safe Practice

Procedures for promoting safe practice in this section are indivisible from and expected to operate in conjunction with other GDST and school policies including:

- Equal Opportunities Policy
- Behaviour / Discipline Policies
- Anti Bullying Policy
- Online Safety Policy
- Policies relating to Physical Intervention
- Disciplinary Procedure
- ICT Acceptable Use Agreement
- Communications including Social Media Policy
- Administration of Medicines Protocol
- Other codes of conduct including, where relevant, boarding house handbooks

These Procedures incorporate guidance produced by the DfE in the document *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings*. Schools are recommended to refer to this guidance for more detailed advice on a range of issues including:

- Infatuations
- One to One Situations
- Transporting Pupils
- Educational Visits and After School Activities

Teachers are also expected to be aware of the standards of personal and professional conduct that form part of the UK Teacher Standards. These are used by the TRA when assessing cases of serious misconduct relating to teachers in independent schools.

Basic Principles

The GDST expects all staff and volunteers to:

- Treat pupils with respect, dignity, sensitivity and fairness
- Value and respect all pupils as individuals
- Demonstrate that they are willing to listen to pupils' views and opinions
- Provide suitable opportunities for pupils to be involved in decision making processes
- Provide positive encouragement and praise to all pupils
- Provide an example of good conduct for pupils
- Ensure that relationships with pupils remain on a professional footing
- Avoid behaviour that could lead a reasonable observer to question their conduct, intentions or suitability to care for children
- If they have concerns about other members of staff or volunteers or the management of safeguarding in the school, to report these to the Designated Safeguarding Lead, or (should this reporting route be inappropriate) to the Director of Legal at Trust Office
- Consider whether their relationships and associations both within and outside of the workplace (including online) may have implications for the safeguarding of children in the school, and be aware that they should raise these in order to help schools identify whether arrangements are necessary to support them and ensure children's safety
- Alert the school as appropriate to any changes to their own personal circumstances which may affect their suitability to work with children. This includes informing their line manager of any medical condition, disability or medication that may affect their ability to do their job, and of any charge or summons to appear in court in relation to a criminal offence (other than minor road traffic violations) Staff and others who work with children in the early years or directly manage the setting are expected

to disclose any convictions, cautions, court orders, reprimands and warnings they have received which may affect their suitability to work with children (whether received before or during their employment at the setting).

Guidelines on Acceptable Behaviour of Staff and Volunteers

In the way you speak:

- Do not address a pupil by any name other than his/her first or preferred name
- Do not encourage or engage in inappropriate humour or chat or gestures (e.g. swearing, sexual connotation or innuendo)
- Do not allow pupils to use inappropriate language unchallenged. Positively challenge inappropriate chat e.g. racist/ sexist comments, swearing or sexual jokes
- Avoid excessive personal compliments about a pupil's appearance
- Do not dictate orders by shouting but request or provide direction to staff or pupils
- Do not enter into arguments or heated debates in front of pupils or parents

In your conduct:

- Be mindful of how you touch pupils – your actions could be misconstrued. Do not carry a child unless absolutely necessary and try not to handle a child below the shoulder unless there is a justifiable reason for doing so
- Be cautious when comforting a distressed pupil with physical contact – which should never be in private. Whenever a teacher touches a child she/he should be aware that the action may be misconstrued or cause offence. Bear in mind the pupil's age and ethnicity, the nature of the distress and her needs and the physical environment. Common sense dictates, however, there are some situations where appropriate physical contact is either necessary or reasonable action to take (see below). If a girl's reaction shows that she is uncomfortable with being touched, the teacher should adjust his/her behaviour accordingly
- If you need to talk to a pupil privately, make sure that this does not put you at risk, i.e. the room should afford privacy but still be in the view of others. If any physical contact occurs in a one-to-one situation, a prompt report should be made to the DSL
- Male staff and volunteers should avoid entering girls' toilets, changing rooms or showers except in an absolute emergency and ideally accompanied by a female member of staff/volunteer. Situations where male staff have had to enter these particular areas should be openly discussed with the staff member's line manager as soon as practical and if necessary recorded
- Do not offer car journeys to pupils unless in an *emergency* and ideally with parental permission. Any transport should be undertaken with at least one adult additional to the driver acting as an escort. Always inform your line manager and log details and reason for the journey ASAP. Staff must ensure they have appropriate insurance in accordance with the information on school trips on the GDST staff intranet
- Do not arrange to socialise with pupils at events other than those relating to school events and with the permission of parents/guardians *and* Head (e.g. end of term celebrations, at weekends or evenings)
- Do not make visits to pupils in their homes or receive pupils at your home unless in an *emergency*, sanctioned jointly by the Head and Director of Legal at Trust Office and ideally with parental permission[4].
- If, in exceptional circumstances, a home visit is considered to be necessary for any reason which is not an emergency, a risk assessment must be conducted and documented in accordance with the Safer Recruitment Consortium's Guidance for Safer Working Practice, and approved in advance by the Head and the Director of Legal, who must also conduct regular reviews of any repeat visit
- Schools which sponsor overseas pupils travelling to the UK alone under the UKVI's tier 4 system are responsible for ensuring appropriate living arrangements are in place. So-called "homestay" arrangements are provided by local residents and are subject to private fostering regulations. Suggestions from members of staff to act as foster carers of a tier 4 sponsored pupil must be handled

carefully and in view of the risks to the school, its staff and pupils. Staff must not be encouraged to carry out a homestay arrangement or given an indication that this is part of their role as a school employee. Any homestay provided by a member of staff is the responsibility of the member of staff to undertake and arrange, and the school must be satisfied it is appropriate in all the circumstances. The requirement to carry out a full risk assessment and conduct regular reviews applies to any homestay arrangement involving a member of staff. Annual safeguarding audits will include a review of any homestay arrangement involving a member of staff.

- Do not single out individual pupils for special gifts or favours or unnecessary individual attention
- Do not allow any allegations made by a pupil or third party to go unchallenged, unrecorded or not acted upon.

In your use of electronic communications/IT:

- Do not give pupils personal contact details (e.g. e-mail, telephone numbers or address), or take personal contact details from pupils except in an emergency, (in which case a member of SLT must always be informed)
- It should not be necessary for staff to have pupils' personal contact details on a routine basis. Where staff might require such details e.g. for the organisation of school activities such as school trips, it is essential that the school provides a contact number for the pupils and it is made clear that whenever personal contact numbers are taken from pupils, the lists are destroyed after the trip and are never stored in any device belonging to a member of staff
- Exercise caution in use of social media, and ensure you are working within the confines of the GDST Communications including Social Media Policy, ICT Acceptable Use Agreement and any other GDST guidance on the use of social media
- Do not engage with pupils using personal social media channels. For example, staff must not become Facebook friends with current pupils (or former pupils below the age of 18) on personal accounts, and must not follow them, or communicate with them, on Twitter, WhatsApp, Snapchat or Instagram

The guidelines above do not apply in relation to the behaviour of staff towards their own children or other close relatives if these children are GDST pupils. Staff with children at their school are expected to use their common sense and careful judgement in determining appropriate boundaries whilst ensuring that safeguarding considerations do not adversely circumscribe their children's social interactions with peers. They should discuss matters with the Head or DSL in advance if uncertain about any specific situation, and likewise inform the Head immediately if something occurs which is problematic or could be misconstrued.

Use of Mobile Phones and Cameras

In order to prevent allegations of inappropriate activities, including against EYFS staff, staff must not store images of pupils (taken in a school capacity*) on any personal device. Any images taken on personal devices must be transferred to school or GDST systems as soon as reasonably possible and the personal copy permanently removed. Staff must be careful to avoid taking any photos of pupils that could be construed as inappropriate, and any photos that may inadvertently be seen as inappropriate should be destroyed.

* applies to staff with relatives who are GDST pupils

Misuse of Alcohol and Drugs

All GDST staff and volunteers are not permitted to misuse, or be under the influence of, alcohol or illegal drugs, on GDST premises or whilst in charge of pupils at any other venue in the UK or abroad. *Disciplinary Action may follow if these guidelines are not upheld.*

Physical Contact between Staff and Pupils

Safeguarding pupils requires both pupils and staff to be clear about safe and acceptable physical contact. However it is just as important for all staff and volunteers to feel comfortable in contributing to providing a safe and caring environment for all pupils, especially for very young children. Staff and volunteers need to feel comfortable in responding to pupils' practical and emotional needs.

It is important to avoid making assumptions about whether or not a pupil wants physical contact, even with very young children, or to assume that one response fits all circumstances. Members of staff should use their professional judgement in specific situations, taking into account the pupil's needs at the time, their age, stage of development, gender, ethnicity and background.

If a member of staff believes that an incident could be misinterpreted, they should inform the Designated Safeguarding Lead immediately.

When is Physical Contact with Pupils Acceptable?
The paramount consideration is the need of the child. Staff should use their professional judgement to comfort or reassure children while maintaining appropriate distance. Never do anything of a personal nature for children that they can do for themselves (e.g. help with toileting, putting on sun cream, drying after swimming or getting dressed).

There are times when it is appropriate for a member of staff/ volunteer to touch a pupil, for example:

- Young children in particular quite often need immediate physical comfort after a fall/ injury
- Helping very young children with personal care tasks (dressing/ drying after swimming) **see also acceptable behaviour above*
- Strapping seat belts for young children
- Some pupils with particular disabilities
- Providing first aid treatment
- Pupil recovering from an accident (e.g. pupils using crutches or in plaster)
- Pupils who are extremely emotionally upset
- To avoid accident or injury in an emergency
- Some contact sports see further Appendix B5
- Some arts activities see further Appendix B6
- Holding the hand of a child at the front/back of the line when going to assembly or when walking together around the school

If a child needs to sit on your lap, sit the child on your lap in a quiet area, in view of other staff or pupils and ask the child to sit 'side saddle', i.e. with his/her legs together, folded across your lap.

Responding to Pupils Making Physical Contact with You
Should a pupil of any age seek you out for physical contact or seem to want to establish an intimate relationship with you *always* discuss this with your line manager. It may be that other staff have experienced similar issues with the same pupil or group of pupils.

For example, a young child needs to be encouraged to demonstrate their affection in different ways in different situations. An older pupil may have developed a "crush" on you and this needs to be sensitively and openly managed with your line manager, to avoid leaving you open to allegations of misconduct or abuse.

In all situations where a pupil initiates inappropriate physical contact, it is the responsibility of the adult to distance themselves and help the pupil understand the importance of personal boundaries. It is important that the incident and the circumstances should be reported to the Designated Safeguarding Lead and recorded as soon as possible, and, if appropriate, a copy placed on the confidential file relating to that pupil.

Sexual Behaviour
Children of any age may behave in a sexual way.

Pupils may need guidance on:

- Self-Awareness
- Social Skills

- Establishing appropriate peer relationships
- Bullying
- Emotional support
- Information and advice about how their behaviour may be perceived by others and possible consequences of their behaviour

Older students may need guidance regarding sex and relationship counselling. In Trust schools the school nurse may be able to assist and guidance is given through PSHE and SRE programmes.

Sometimes, inappropriate sexual behaviour may require the pupil to receive advice and guidance from professionals outside of the school. It is also possible that inappropriate sexual behaviour is a sign that the pupil could be at risk of significant harm. These matters need to be considered under the school safeguarding procedures.

Abuse of Trust
Under the Sexual Offences Act 2003, it is a criminal offence for any person over 18 in a position of trust to engage in a sexual relationship with a pupil under 18; this constitutes 'Abuse of Trust'. This is to prevent adults abusing their position of trust, for example by persuading, encouraging or intimidating pupils into certain behaviours or activities.

The law applies to anyone working in schools in a paid or voluntary capacity, including sixth formers and gap-year students, even if they do not teach the child and even if *pupils are of an age to consent to sexual activity* and applies *even if both parties consent* to the sexual relationship.

A sexual or intimate relationship between a member of staff or volunteer and a sixth former over the age of 18 is also unacceptable, even though not a criminal offence, and will be dealt with under the provisions of the GDST disciplinary procedure and is likely to be considered as gross misconduct.

Schools must ensure that all staff, volunteers and gap-year students are informed about the requirements and implications of "Abuse of Trust." and that the GDST extends the requirements of staff behaviour and the consequences of non-compliance with these procedures to include inappropriate relationships with 6th formers who are 18 years old.

Confidentiality

Members of staff have access to confidential, personal information in order to undertake their everyday responsibilities. This information must be handled responsibly and sensitively.

It is important to:
- Avoid sharing information casually in conversation or other than on a need-to-know basis
- Avoid holding sensitive discussions about pupils in public areas, such as corridors, dining areas or playgrounds
- Keep notes and records about pupils suitably secure
- Be careful about the kinds of personal information about pupils which are on view in staff rooms, work areas and offices, especially if these areas are used or visited by parents, visitors or contractors
- Make sure you are familiar with the Record Keeping section within the Safeguarding Procedures
- Ensure you are familiar with your responsibilities under the General Data Protection Regulations and Data Protection Act 2018 (further guidance is available on the GDST staff intranet)

In areas where confidentiality may be an issue, it is important to remember that it is the welfare and safety of the pupil which is the key focus.

Children need to be educated that other members of staff may have to pass information on to others in order to help them and keep them safe. In certain circumstances, it may also be the case that pupils themselves receive a disclosure, and should understand the importance of passing such information on, and who to speak to. It is important to reassure pupils, including very young children, that if their personal information is shared it will only be passed on to those who need to know and will not become common knowledge amongst other staff/pupils. This can be brought to the attention of pupils through:

- PSHE and Sex and Relationships Education
- RS/RE discussions on ethical issues
- Assemblies
- Part of induction arrangements for new pupils
- Displays of material about external organisations which offer help and support
- Leaflets and other material telling pupils and parents about pastoral care arrangements
- Discussions with parents

Where applicable, include a clear and pupil-friendly statement about confidentiality within material produced by the school nurse or welfare counsellor.

It is essential that staff avoid being pressured into promising that they will keep information 'secret' when pupils give them information about changes in their family, their concerns, worries or other possible indications of abuse. The dangers of keeping secrets are that this approach:

- helps perpetuate the cycle of secrecy and concealment which characterises much abusive behaviour
- leads to the child feeling a greater sense of betrayal when material has to be disclosed, again reinforcing a sense that adults cannot be trusted
- will put you into an impossible situation, for example, if the child then discloses evidence of extensive abuse or a situation in which a vulnerable sibling is clearly at risk of significant harm

See Section 2 for further guidance on Confidentiality, Information Sharing and Consent.

Behaviour Management

Individual schools are expected to develop policies relating to, and communicate clearly to all pupils and parents, their model of positive discipline (including a hierarchy of sanctions) in order to encourage positive behaviour, respect for others and a sense of self discipline appropriate to the pupils' age and understanding.

The Behaviour Policy or Code **must** include the promotion of good behaviour, self-discipline and respect, and show the place of rewards and sanctions. Regard should be had to the DfE Guidance *Behaviour and Discipline in Schools* which covers the following key areas:

- Duties under the Equality Act 2010 including issues related to pupils with disabilities and how reasonable adjustments are made for these pupils
- A consistent approach to behaviour management
- Strong school leadership
- Classroom management
- Rewards and sanctions; behaviour strategy and the teaching of good behaviour
- Staff development and support
- Support systems for pupils
- Liaison with parents and other agencies
- Managing pupils' transition
- Organisation and facilities
- Disciplinary action against pupils who are found to have made malicious accusations against staff.

Individual school Behaviour and Sanctions Policies should also reflect the following guidelines:

Sanctions that are permissible

- Removal from the group/class
- Withdrawal from break or lunch time activities
- Withdrawal from any school trip, sporting or arts event which is not essential to the curriculum
- Completion of assigned work
- Carrying out a useful task in school
- Detention (with 24 hours' notice and consideration of safe return home of pupil if outside school hours; it cannot be used informally at the end of the school day)

The requirement to give 24 hours' notice of detention has recently been rescinded. However schools are **strongly advised** to retain previous practice and give 24 hours' notice of a detention and consider the safe return home of the pupil if after school hours.

It would be acceptable for staff or volunteers to help a pupil recognise and understand their behaviour by talking calmly about feelings and the consequences of their behaviour, including helping them to "put themselves in the other person's shoes".

Sanctions which are not permissible

- Physical violence e.g. punching, kicking, pushing, shaking or pulling limbs, hair or clothing
- Persistent or aggressive shouting (other than to ensure safety in an emergency)
- Throwing missiles e.g. objects, books, pencil cases, chalk, rubbers
- Humiliation (e.g. wearing distinctive or inappropriate clothes))

No forms of corporal punishment are permissible. Corporal punishment is defined as;

"*Any degree of physical contact which is deliberately intended to cause pain, injury or humiliation"*

Controlling Anger and Responding to Aggression

In the unlikely event of a staff member or volunteer feeling threatened verbally by a pupil, s/he could:

- Point out to the pupil that their language is inappropriate and offensive and tell them to stop
- Direct the pupil to an activity, task or quiet area
- Request the pupil to report to a teacher / the Head / wait in reception area (depending on the pupil's age and understanding) provided that you have considered the safety of the pupil
- Request the pupil to leave the room (depending on the pupil's age and understanding) provided that you have considered the safety of the pupil
- If a pupil removes him/herself from your charge, you should suggest a safe place for him/her to "cool off" and ensure that another staff member or volunteer checks that the pupil is safe
- If the pupil appears to be placing him/herself "at risk" you must contact another member of staff *immediately* to help you respond to the situation.

In the unlikely event of a staff member or volunteer feeling threatened physically by a pupil, you will have to judge whether it is best for you to:

- walk away and get further help, or
- calmly reason with the pupil

If you are so emotionally upset that you leave the pupils in your charge you *must inform* another member of staff *immediately,* to allow for the safe supervision of the pupils.

You should always report the incident to your line manager or supervisor so that you can be supported and the pupil can be sanctioned appropriately and receive guidance on his/her behaviour.

Use of Reasonable Force

All members of staff (and other staff whom the Head has temporarily put in charge of pupils such as volunteers or parents accompanying students on a school organised visit and volunteers with the Head's

permission) are legally entitled to use reasonable force to control or restrain pupils but must not use force as a punishment. This entitlement applies not only whilst on school premises but also whenever the teacher (or other person with the Head's permission) has lawful control or charge of pupils.
When can reasonable force be used?

- Reasonable force can be used to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder.
- In schools, force is used for two main purposes – to control pupils or to restrain them.
- The decision on whether or not to physically intervene is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.

The following list is not exhaustive but provides some examples of situations where reasonable force can be used:

- To prevent immediate danger/injury to the pupil concerned, any other pupils, staff, or volunteers
- To prevent serious damage to property
- To prevent serious breaches of school discipline
- To prevent a pupil behaving in a way that disrupts a school event or a school trip/visit
- To remove disruptive children from the classroom where they have refused to follow an instruction to do so
- To prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others

Safe methods of reasonable force must be used for the *shortest period* of time necessary and with the *minimum amount of force necessary to achieve the desired result*.

When using reasonable force in response to risks presented by incidents involving pupils with SEND or medical conditions, schools should carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments.

In addition to the general power to use reasonable force, Heads and authorised staff can "use such force as is reasonable in the circumstances for exercising that power" in relation to a search for knives or weapons, alcohol, illegal drugs and stolen items, tobacco and cigarette papers, fireworks and pornographic images. Guidance on the power to search without consent is included in the Drugs, Alcohol and Tobacco Guidance in the Legal section on the GDST staff intranet.

The use of inappropriate or excessive force may result in disciplinary action or criminal charges.

- Inappropriate use of force is using force as a punishment or when the situation could have been resolved without using force or degrading the pupil**;**
- Excessive force is using too much force and / or using force for too long a period of time.

There is no legal requirement to have a separate policy on the use of restraint, however it is recommended that where this is not the case the school's behaviour policy addresses the use of force. In either case, the relevant policy should include:

- A statement that corporal punishment is forbidden and examples of what is regarded as corporal punishment
- Clear examples of when restraint may be used
- Acknowledgement of the legal duty to make reasonable adjustments for disabled children.
- A recording and reporting protocol for incidents when restraint was required, including guidance on when to report use of force to parents
- Support for staff who have had to use restraint
- Follow up and support for pupils who may have witnessed the incident

The policy should also include sections on the following:

- the objectives of:
    - Maintaining the safety of pupils and staff
    - Preventing serious breaches of school discipline and serious damage to property
- Minimising the need to use force
- Staff authorised to use force
- Deciding whether to use force and should say that staff should only use force when:
    - The potential consequences of not intervening were sufficiently serious to justify considering use of force
    - The chances of achieving the desired result by other means were low; and
    - The risks associated with not using force outweighed those of using force
    - The policy should also emphasise the importance of only using the minimum force necessary to achieve the desired result
- Staff training
- Post-incident support

All incidents involving use of restraint must be reported and recorded in accordance with the school's own internal policies and procedures.
For further information schools should refer to the DfE guidance *Use of Reasonable Force in Schools* 2013.

Corporal Punishment

All staff, including volunteers, must be aware that corporal punishment is illegal and must not be used in GDST schools for any reason, whether or not on school premises. Teachers may use physical intervention to avert an immediate danger of personal injury to, or an immediate danger to the property of, a person or child.

Knives or Weapons

The GDST will not tolerate the carrying or use of any weapons. Staff or volunteers who become aware of a knife, weapon or instrument they suspect may be used to cause harm to any person or to self harm (e.g. blades), must inform their line manager or supervisor immediately.

The line manager/ supervisor must **immediately** assess the situation and consider if there is an immediate risk or danger to any persons in the vicinity. If so contact the police and:

1. consider if the pupil can be approached sensitively and asked to relinquish the weapon/ instrument safely;
2. direct other pupils to a place of safety if necessary, before approaching the pupil concerned.

If the weapon/ instrument is relinquished without further incident, the school pastoral support team will need to consider:

- The pupil's understanding of the situation and intent
- Communication with parents/ guardians
- Disciplinary action or Pastoral Care Plan, including additional professional help depending on the context of the individual case
- Appropriate disposal of any weapon (possibly contact with the police)
- Developing a risk management strategy for the individual pupil concerned, in order to ensure the future safety and well-being of pupils, staff & volunteers at the school.

For further information on search procedures see the Exclusions Policy.

Appendix A1

GDST Record of Safeguarding Concern

This form should only be used when there is a safeguarding or welfare concern regarding a pupil at the school and CPOMS cannot be accessed to report this.

Safeguarding includes protecting children from maltreatment, preventing impairment of their **health** or **development**, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

This form should be completed as soon as possible after any specific disclosure **or** cause for concern and sent **immediately to the Designated Safeguarding Lead** with any contemporaneous notes. Completion of the form should **not** delay reporting to the Designated Safeguarding Lead.

Staff/Volunteer name …….. Role……..

Pupil ……. Form……..

Day & date…….. Time……

Disclosure OR Nature of concern
Record full details of conversation or reasons for concern (use continuation sheet if necessary):

- Where possible use the exact words and phrases used by the pupil, do not translate into "proper terms", and note non-verbal behaviour
- Note any witnesses or others people who are aware of the situation
- Where there is a more general wellbeing concern state all facts giving rise to the concern
- Clearly distinguish between fact, observation, allegation and opinion

……
……
……
……
……
……
……
……

The pupil's views and wishes

……
……
……
……
……
……
……
……

Did you explain to the pupil that you would need to refer the matter to the Designated Safeguarding Lead, and that you could not promise confidentiality? YES/NO
What was the pupil's response? [Note exact words where possible]

……
……

Action Taken/Follow up

……
……
……
……
…….

Signed …… Time and date ……

This completed form, together with any other note taken should be passed to the **Designated Safeguarding Lead** or Deputy Designated Safeguarding Lead **immediately**. However if an allegation or complaint is made against the Designated Safeguarding Lead, this information should be passed directly to the Head.

For use by Designated Safeguarding Lead/Head (use continuation sheet if necessary)
Comments/Action taken and follow up (include feedback given, details of any agencies contacted and whether Trust Office has been informed)

……
……
……
……
……
……
……
.....
.....
.....
.....
.....

Signature of Designated Safeguarding Lead……

Signature of Head……

Appendix A2 - Sources of Support for Staff and Volunteers

[to be completed with local details for staff reference]

Staff or volunteers may feel adversely affected by incidents of abuse they have been exposed to personally or professionally. Trust Office People/HR Department (contact no. 020 7393 6646) and/or the confidential staff Employee Assistance Programme (provided by BUPA – contact no. 0300 123 1090) will be able to offer advice and help.

The following organisations may also be helpful sources.

Counselling Services

Organisation	Contact Details
Your Local General Practitioner may be able to arrange free counselling through your local GP surgery	
Lists of professionally qualified counsellors and therapists in your area can be obtained from MIND or the British Association for Counselling and Psychotherapy (BACP)	www.mind.org.uk http://www.bacp.co.uk/
Local Citizens Advice Bureau	tel ……
Education Support Partnership	www.educationsupportpartnership.org.uk free helpline 08000 562 561
The Women's Therapy Centre	http://www.womenstherapycentre.co.uk/ 020 7263 7860
Parentline Plus	www.parentlineplus.org.uk 0808 800 2222
The Samaritans	http://www.samaritans.org/ 08457 90 90 90
The NSPCC Child Protection Helpline: (24-hour free service that will give advice and information)	0808 800 5000 help@nspcc.org.uk
The NSPCC Whistleblowing Helpline	0800 028 0285 help@nspcc.org.uk
The Professionals Online Safety Helpline (POSH)	0844 381 4772 http://www.saferinternet.org.uk/about/helpline
Your Local Social Services Your Out of Hours Social Services	Tel no …….. Tel no ……
Other school contacts e.g. school counsellor, school nurse	

Appendix A3

Role of the Designated Safeguarding Lead

The **Designated Safeguarding Lead** (DSL) is the senior member of staff designated to take lead responsibility for safeguarding and child protection (including online safety) at the school, and to support all other staff in dealing with any child protection concerns that arise. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

Key aspects of the role include:

- ✓ Making sure that all staff are aware of how to raise safeguarding concerns
- ✓ Ensuring that all staff understand the symptoms of child abuse and neglect
- ✓ Referring any concerns to social care
- ✓ Monitoring children who are the subject of child protection plans
- ✓ Maintaining accurate and secure child protection records
- ✓ Ensuring that all staff adhere to the school's safeguarding policy and procedures
- ✓ Promoting a safe environment

The broad areas of responsibility for the DSL are:

Managing referrals
The DSL is expected to:

- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies

- Act as a point of contact with the three safeguarding partners

- Refer all cases of suspected abuse to the local authority children's social care and:

    - The 'case manager' and designated officer(s) for child protection at the Local Authority concerns (all cases which concern a staff member);

    - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or

    - Police (cases where a crime may have been committed).

- Liaise with the Head to inform him/her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations

- Act as a source of support, advice and expertise for all staff on matters of safety and safeguarding

Training
The DSL should receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so

- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff

- Be alert to the specific needs of children in need, those with special educational needs and young carers

- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulations.

- Understand the importance of information sharing, both within school and college, and with the three safeguarding partners, other agencies, organisations and practitioners

- Understand the unique risks associated with online safety, particularly with reference to vulnerable groups such as pupils with SEND, and be confident that they have the relevant knowledge and up to date capability to keep children safe online

- Be able to keep detailed, accurate, secure written records of concerns and referrals

- Obtain access to resources and attend any relevant or refresher training courses

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them

In addition to the formal training, the DSL should update her/his knowledge at regular intervals and at least annually, in order to keep up with any developments relevant to their role.
The DSL is also responsible for organising staff safeguarding training, delivering the training where appropriate, and keeping accurate records of all training undertaken.

Raising Awareness
The DSL should ensure that the school's policies are known and used appropriately:

- Ensure that the GDST's Safeguarding and Child Protection Policy and Safeguarding Procedures (as reviewed at least annually by the GDST) are customised with appropriate names and contact details; and that implementation is reviewed regularly. Work with Trust Office to ensure that documentation and procedures are reviewed in an annual audit

- Ensure that the Safeguarding and Child Protection Policy is available publicly on the school's website, and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this

- Ensure that staff are kept informed of changes to the Safeguarding and Child Protection Policy and to the Safeguarding Procedures and to other relevant legislation and guidance, in particular *Keeping Children Safe in Education*

- Link with the local safeguarding partners and Trust Office to make sure staff are aware of training opportunities and the latest local policies on safeguarding

The DSL is also responsible for ensuring information relating to safeguarding concerns is sought from any feeder schools and, where children leave the school, ensuring their child protection file is transferred to the new school as soon as possible. This should be transferred separately from the main pupil file, via secure transit, and confirmation of receipt should be obtained.

Preventing radicalisation
In accordance with the *Prevent duty,* the DSL has the following responsibilities:

- Act as the first point of contact and provide advice and support for parents, pupils, teaching and support staff and external agencies in all matters relating to the *Prevent* Duty
- Co-ordinate *Prevent* Duty procedures in the School
- Undergo appropriate training on the *Prevent* Duty, such as the Home Office 'Workshop to Raise Awareness of Prevent' (**WRAP**) training
- Undergo appropriate training on the Channel programme
- Assess the training needs of all school staff in relation to the *Prevent* Duty, and implement and maintain an ongoing training programme for staff including induction training for all newly appointed staff and volunteers; keeping records of such staff training
- Monitor the keeping, confidentiality and storage of records in relation to the *Prevent* Duty
- Liaise with local *Prevent* co-ordinators, the police and local authorities and existing multi-agency forums in all necessary or appropriate circumstances relating to the *Prevent* Duty.

Role of the deputy Designated Safeguarding Lead

The **Deputy Designated Safeguarding Lead** is the member of staff designated to deputise for the DSL in child protection matters at the school. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

The Deputy DSL's role may encompass two dimensions:

1. Deputise for the DSL in the latter's absence, covering all areas of responsibility described in the DSL Role
2. Lead on child protection responsibilities within a defined section of the school.

The deputy DSL must be trained to the same standard as the DSL.

Part B: The Management of Safeguarding

B1. Safeguarding Strategy Statement

The GDST Safeguarding Strategy forms a fundamental part of our approach to providing excellent pastoral care to all pupils, including those who may be over the age of 18 years. All pupils have the right to protection from all types of harm and abuse and the promotion of their welfare.

The GDST Safeguarding Strategy consists of:-

1. *GDST Safeguarding and Child Protection Policy*
2. *GDST Safeguarding Procedures*
3. *GDST Model School Safeguarding and Child Protection Policy*
4. Training to equip staff and volunteers to carry out their responsibilities in relation to safeguarding and promoting the welfare of pupils.

The Safeguarding Strategy provides a clear framework within which individual schools will develop systems and local procedures to:-

- Prevent unsuitable people working with children
- Identify pupils who are at risk of, and/or are likely to suffer significant harm and take appropriate action, and promote the welfare of pupils in need of additional support
- Record and share information appropriately
- Respond to allegations against staff and volunteers
- Promote safe practice and challenge poor and unsafe practice.

Adherence to the GDST Safeguarding Strategy is mandatory for **all** staff and volunteers.

Schools have a legal obligation to have a written policy for safeguarding pupils and procedures for implementing the policy. Schools are required to adopt and customise the *GDST Model School Safeguarding and Child Protection Policy* for local use, with relevant additional information to support their particular situation and locality, e.g. names of relevant staff, local school and multi-agency procedures, and relevant contacts within the local child protection agencies. It is important that each school ensures that their own Policy and related procedures are compatible with and meet all requirements of their local safeguarding partners..

In the relevant section of its policy and procedures each school should include names, addresses and contact details of multi-agency child protection and safeguarding staff, as well as any additional sources of local support for both staff and pupils, including, for example:

- Local Authority Designated Officer(s) for Child Protection (**LADO**);
- Local Social Services Department[5] (Children's Services) (of which the LADO will be part);
- Out of Hours Social Services Emergency Duty Team;
- Chair of local safeguarding partners;
- Other local agencies who may be able to provide additional help such as CAMHS (Child and Adolescent Mental Health Services);
- Other Child Protection Agencies such as the Police.

Individual schools are encouraged to establish positive communication with their local safeguarding partners to ensure compliance with any changes in local protocol and access to relevant support from their local safeguarding partners.

[5] This may also be referred to as Children's Social Care or local authority children's social care, or Social Services

Relevant Guidance

Individual schools should have full copies of (or access to) all guidance documents including:

- *Keeping Children Safe in Education* September 2019
- *Working Together to Safeguard Children* July 2018
- *What to do If you're worried a child Is being abused* March 2015
- *Mental Health and Behaviour in Schools* March 2016
- *Counselling in schools: a blueprint for the future* February 2016
- *Supporting pupils at school with medical conditions* December 2015
- *Promoting the education of looked-after children and previously looked-after children* February 2018
- *Information Sharing: advice for practitioners providing safeguarding services* July 2018
- DBS Referrals Guidance (as may be amended from time to time)
- *Teacher misconduct: regulating the teaching profession* 2014 (and related guidance)
- *Screening, searching and confiscation: advice for schools* January 2018
- *Use of Reasonable Force in Schools* July 2013
- *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings* May 2019
- *Supervision of activity with children which is regulated activity when unsupervised* September 2012
- EHRC Guidance *What equality law means for you as an education provider: schools* March 2014
- *Preventing and Tackling Bullying* July 2017
- *Disqualification under the Childcare Act 2006* September 2018
- *Prevent Duty Guidance, Channel Guidance,* and *Prevent Departmental Advice,* 2015
- *The use of social media for online radicalisation* July 2015
- *Teaching Online Safety in School* June 2019
- *Sexting in schools and colleges: responding to incidents and safeguarding young people* UKCCIS
- *Sexual violence and sexual harassment between children in schools and colleges* May 2018
- *Criminal Exploitation of Children and Vulnerable Adults: County Lines Guidance* July 2017
- *Relationships Education, Relationships and Sex Education (RSE) and Health Education*

In addition, it is best practice for schools to hold full copies of the relevant legislative and regulatory documents as appropriate, for example:

- *Education (Independent Schools Standards) Regulations* 2014 (as amended from time to time)
- *The Independent School Standards Guidance for independent schools* April 2019
- The most recent version of ISI's *Commentary on the Regulatory Requirements*

Schools should also be aware of the relevant sections of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012, and the legislation restricting the publication of allegations of teacher misconduct incorporated by the Education Act 2011.

Wales

These Procedures are based on the legislation and guidance relating to England. In relation to Howell's school in Wales, the legislative and regulatory framework and government guidance differs from the above. The key documents as apply in Wales are as follows:

- *The Independent School Standards (Wales) Regulations* 2003 (as amended from time to time)
- Education (Independent Schools) (Unsuitable Persons) (Wales) Regulations 2009
- *Keeping Learners Safe* January 2015 (Welsh Government Guidance)
- *Safeguarding Children: Working Together Under the Children Act 2004* 2007 (Welsh Assembly Government Guidance)
- All Wales Child Protection Procedures 2008
- *Safeguarding children in education: handling allegations of abuse against teachers and other staff* April 2014

- Estyn Guidance for the Inspection of Independent Schools September 2010 (updated 2016)

Boarding
In relation to the Royal High School Bath, as a boarding school further regulations apply. The key document is the *National Minimum Standards for Boarding Schools* (NMS) April 2015 together with the relevant paragraphs as apply to boarding schools in the guidance documents listed in this section.

Equality
In meeting its safeguarding obligations schools should be mindful of their obligations under the Equality Act 2010.

B2. Roles and Responsibilities

GDST
The GDST has produced a Trust-wide *Safeguarding and Child Protection Policy* and *Safeguarding Procedures*, which have been made available to all schools and provide a framework for schools' own policies and procedures. Trust Office will also provide advice and support where required on all safeguarding issues. The GDST will ensure that the implementation of this framework by individual schools is regularly monitored and reviewed. Specific roles and responsibilities are set out below.

Council of the Trust
As the proprietor, the Council of the Trust has the following responsibilities, which are delegated to the Audit Committee:

- To annually review the *GDST Safeguarding and Child Protection Policy* and approve any substantive changes to it. The policy is formally re-approved on a three yearly basis.
- To oversee compliance with the *Safeguarding and Child Protection Policy* and other relevant audit processes as required
- To nominate a member of Council, who is also on the Audit Committee, as 'Safeguarding Lead' to take leadership responsibility for safeguarding at organisation level, delegating where appropriate to members of the Senior Management Team, and updating Audit Committee on significant safeguarding issues during the year
- To receive regular reports on the outcome of annual school safeguarding audits

In addition, Council shall receive an annual report via the Audit Committee from the Senior Management Team on key regulatory changes and actions taken to address any emerging themes. The Safeguarding Lead receives a separate report on any serious safeguarding issue.

Chief Executive
The Chief Executive has overall responsibility for safeguarding across the Trust, which is delegated as set out in the *Safeguarding and Child Protection Policy* and *Procedures*. The Chief Executive also signs off on minor amendments to the *Safeguarding and Child Protection Policy*.

Director of Legal
The Director of Legal is the nominated GDST safeguarding lead with reference to responding to safeguarding incidents and allegations against members of staff, and thus:

- Is the first point of contact in the event of a safeguarding issue and/or allegation against a member of staff being reported by a school;
- Is kept informed and provides the school with advice and guidance, particularly in the event of a referral being made to Social Services;
- Leads the procedures (in place of the Head) in the event of an allegation being made against the Head;
- Where required, assists the school in making a referral to the DBS (and the Teaching Regulation Agency (TRA) where relevant) where the GDST ceases to use the service of any person for being considered unsuitable to work with children, in accordance with our legal duty;
- Where required to do so, provides information requested by the DBS and/or TRA in respect of a member of staff or volunteer, in accordance with our legal duty;
- Reports to the Charity Commission where required;
- Is the first point of contact for staff raising concerns under the duty to report concerns about the management of safeguarding, where it is necessary to consult outside the school;
- Ensures the checks mandated by recruitment legislation are carried out for Members of the Council of the Trust and Trust Office staff;
- Maintains a central record of safeguarding incidents reported to Trust Office, reviewing these termly, and reporting annually to Council on safeguarding incidents in schools.

Director of Innovation and Learning

The Director of Innovation and Learning is the nominated GDST safeguarding lead, with specific reference to Policy, Procedures and compliance, and thus:

- Draws up the *Safeguarding and Child Protection Policy* (GDST and schools template versions) and the *GDST Safeguarding Procedures*;
- Reviews the Policy and Procedures annually and as required by changes in legislation, guidance and practice;
- Keeps related policies (e.g. Anti-Bullying, Recruitment etc.) under review from the safeguarding perspective;
- Monitors the area of safeguarding and ensures the latest national guidance is reflected in GDST policy and practice;
- Reviews the central record of safeguarding incidents reported to Trust Office each term;
- Recommends to the Chief Executive amendments to the Policy, Procedures (and related policies and procedures) as required by the outcome of annual internal review of policies and procedures, safeguarding audit processes, changes in legislation, issues raised and recommendations from other committees (e.g. Health and Safety Committee etc.), and from reviews of the central record of safeguarding incidents;
- Signs off on amendments to the Procedures;
- Monitors and reviews compliance with the Policy and Procedures via the school safeguarding audit, and ensures any recommendations made are put into practice by schools
- Reports to the Audit Committee on the outcomes of internal audit;
- Arranges for the provision of any further central training or support felt to be necessary to complement school and local safeguarding partner training.

Procedures for reporting safeguarding issues to Trust Office and for the annual internal safeguarding audit are set out in Appendix B11.

Heads

Each Head is responsible to the Council of GDST for compliance with statutory requirements in relation to safeguarding. S/he should therefore ensure that:

- Sufficient staff are appointed to undertake the role of Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead in relation to the size and composition of the school, the number of sites and the needs of pupils on each site. Schools that have separate sites or separate management lines should have a designated person for each section[6]. A designated practitioner should also be named to take responsibility for safeguarding children within the EYFS. The DSL should be on the school's leadership team and have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and protection matters, to take part in strategy discussions and inter-agency meetings – and/or to support other staff to do so – and to contribute to the assessment of children. Designated Safeguarding Lead(s) should have regular reviews of their own practice and opportunities to discuss any concerns they may have[7].
- The Designated Safeguarding Lead(s) are provided with job descriptions which specify that they have lead responsibility for safeguarding and child protection issues including liaising with the Local Social Services Department (Children's Services) "Social Services", representing the school in inter-agency working, online safety and liaising with parents (broad areas of responsibility for the DSL are set out in Annex B of *Keeping Children Safe in Education*). The role of Deputy DSLs must also be explicit in their job descriptions.
- All Designated Safeguarding Leads have undertaken training to equip them to exercise their responsibilities effectively, including training on child protection and inter-agency working and training in the LCSB's approach to Prevent duties, refreshed at least every two years (and with updates at least annually). This training may be provided by the local social services department or an external welfare

[6] ISI Commentary September 2019 para 192
[7] ISI Commentary September 2019 para 195

agency acceptable to the local safeguarding partners. It is recommended that the school obtains written confirmation from the local safeguarding partners that the training is at the appropriate level for a Designated Safeguarding Lead (some Local Authorities will refer to this as level 3 training). Deputies should be trained to the same standard as DSLs.

- A number of staff have undertaken safer recruitment training[8], so that at least one member of a recruitment panel involved in all stages of the recruitment process has been trained, and to allow a margin for staff availability/turnover (it is good practice to ensure that the panel member trained in safer recruitment practices is involved in all stages of the recruitment process, but not a requirement for independent schools[9]). Staff are advised to refresh their training every two years.
- All staff and volunteers follow the school's *Safeguarding and Child Protection Policy* and procedures, and sign the Agreement to Work in Accordance with the GDST Safeguarding Strategy (form at Appendix B4), a signed copy of which should be kept on the relevant member of staff's file.
- All staff and volunteers (including the Head him/herself) have undertaken up to date and appropriate training to equip them to carry out their responsibilities for safeguarding effectively, refreshed regularly (and with annual updates), in line with advice from the local safeguarding partners[10] (this can be provided by the designated person as long as their inter-agency training is up to date). For inspection purposes, schools will need to demonstrate that they consult with their local safeguarding partners regarding the most appropriate schedule, level and focus for this training.[11]
- All staff are informed as soon as possible of any changes to the Safeguarding Policy or Procedures.
- Safeguarding training for all staff is included as a key area in all induction procedures and is regularly referred to when reminding staff of key procedures at the start of each academic year, noting any changes to the procedures or to the relevant contact details.
- Arrangements are made (if necessary through supply cover) to allow the Designated Safeguarding Lead(s) to attend strategy meetings, child protection conferences or to contribute to the assessment of a pupil "In Need".
- Procedures for dealing with allegations of abuse against staff/volunteers are followed and that all staff and volunteers are aware of them.
- The required referral is made to the DBS (and the TRA) in cases of teachers' serious professional misconduct) where the school ceases to use the services of any person for being considered unsuitable to work with children.
- The School Governing Board is kept informed of school developments and the safeguarding strategy, although they have no formal role in relation to safeguarding.
- S/he reviews the SCR regularly and at least termly to ensure that all regulatory appointment checks are carried out correctly
- Any deficiencies or weaknesses with regard to safeguarding matters in their school are brought to the attention of the Chief Executive of the GDST and are remedied without delay.

Designated Safeguarding Leads

The main role of the Designated Safeguarding Lead (DSL) is to refer cases of suspected abuse or allegations to the local child protection agencies as appropriate and in accordance with local safeguarding partner procedures. The DSLs should keep the Head informed about pupil welfare/child protection issues and ensure that there is always cover for their role (including for any out of hours/out of term activities) and that arrangements for cover are communicated clearly to staff. DSLs must:

- Have a working knowledge of how their local safeguarding partners operate and have received training on: how to identify child abuse and their local referral protocol, how to support children in need, and how to contribute effectively to a child protection conference; in addition to record keeping and promoting a culture of listening to children (see *Keeping Children Safe in Education* Annex B)

[8] This is available from the NSPCC http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course/?utm_source=dreammail&utm_medium=email&utm_content=textlink-online-training&utm_campaign=141205-online-training

[9] ISI Commentary September 2019 para 190

[10] *Keeping Children Safe in Education 201*9 para 84

[11] ISI Commentary September 2019 para 201

- Receive appropriate training in child protection and inter-agency working as advised by the local safeguarding partners at least every two years, and in addition to formal training, update their knowledge and skills at regular intervals and at least annually, in order to keep up with developments relevant to the role
- Undertake Prevent awareness training in order to be able to identify children at risk of radicalisation and provide advice and support to other members of staff on protecting children from the risk of radicalisation
- Take lead responsibility for online safety, including the oversight of the school's internet monitoring reports
- Be responsible for ensuring that all cases of suspected or actual child protection concerns are investigated and managed in accordance with appropriate guidance.
- Refer cases of suspected abuse or allegations to local Social Services as appropriate and in accordance with local safeguarding partner procedures.
- Ensure that they are aware of the latest national and local guidance and requirements in relation to safeguarding, and keep the Head, staff and volunteers informed as appropriate.
- Act as a source of advice and support within the school in relation to safeguarding concerns.
- Ensure that all staff and volunteers have the relevant level of regular training in child protection and Prevent awareness, and keep an up to date, itemised record of such training, including induction, refresher updates (e.g. during INSET which covers child protection), updates to *Keeping Children Safe in Education* , and safer recruitment training.
- Ensure staff and volunteers have access to and understand their role in the child protection procedures, particularly part time staff, supply staff, self employed individuals, newly qualified staff, boarding staff, newly appointed staff, before/after school care staff, catering staff, cleaning staff, caretakers, volunteers and gap year students.
- Work with Trust Office to ensure that the school's Safeguarding Policy is reviewed and updated annually, and that the latest version is available on the school web site.
- Work with the Head to ensure that any deficiencies or weaknesses identified in the school's policy or procedures are reported to the Director of Innovation and Learning without delay.

A sample role description for the Designated Safeguarding Lead and deputy Designated Safeguarding Lead can be found in Appendix A3.

School Governing Boards

The School Governing Board (SGB) needs to ensure that its members understand that the SGB has no formal responsibilities in relation to child protection and safeguarding, since these fall to the Council, acting via its Audit Committee and through the CEO and Officers. The SGB should however:

- Familiarise itself with the school's safeguarding policy and procedures.
- Designate a member as a 'champion' for Safeguarding.
- Satisfy itself that a culture of safeguarding is promoted at the school.

Responding to allegations:

- Clear arrangements should be in place for communication by the Deputy Head and Chief Executive with the Chairman of each School Governing Board in the rare event of an allegation being made against a Head.
- In cases of allegations against staff, members of the School Governing Board need to have accurate information in line with the agreed communication plan and ahead of public speculation or media interest. The information given should not breach the reporting restrictions introduced by the Education Act 2011, confidentiality or include unnecessary details.

Boarding Staff

The GDST is committed to ensuring that boarding staff are properly equipped for their roles and responsibilities through a variety of methods such as the staff induction programme, supervision (formal and informal), individual and whole school Continuing Professional Development and Training. The GDST regard boarding staff as having a unique experience and insight with regard to matters concerning pastoral care and

safeguarding pupils and will ensure that the views of boarding staff are incorporated into the ongoing development of the Safeguarding Strategy.

School Nurse

The school nurse's role is to promote the health, welfare and development of pupils and as such is uniquely positioned to contribute to the effective delivery of the Safeguarding Strategy.

School Nurses are bound by the rules and codes of conduct of their external regulatory body, the Nursing and Midwifery Council This permits nurses within a school environment to provide confidential medical advice and treatment to pupils, including on matters relating to sexual health and treatment. The school nurse is however required to use her professional judgement in each individual case and to *encourage* the pupil or student to:

- Inform his/her parents/ guardian about treatment s/he receives or is considering;
- Carefully consider possible implications of such treatment in relation to the pupil's racial and cultural heritage and /or religious background.
  The Fraser Guidelines should be followed when providing such advice.

In addition, the school nurse must be aware of their duty to disclose information if they believe a child may be at risk of harm. It is therefore important that the nurse is aware of pupil safeguarding concerns, so than any assessment carried out is complete. A school nurse who has any cause for concern about a pupil's safety or welfare **must report** this in accordance with the school's safeguarding procedures. Both pupils and staff need to be clear that the school nurse can offer confidential medical advice and treatment, including to pupils under 16 years, but that they **must report** any concerns about the welfare or safety of pupils to the Designated Safeguarding Lead. School nurses should ensure that they fully understand their safeguarding obligations, and how this can override medical confidentiality, and be familiar with the provisions and guidance in relation to Information Sharing and Consent. Guidance can be sought on managing these competing duties from the Legal Department at Trust Office.

School nurses are well placed to provide informal support to pupils, on a variety of levels to advance their welfare and learning experience. Their role and responsibilities should incorporate a wide interpretation of promoting health and development (e.g. psychological health and developing healthy lifestyles) for the benefit of all pupils. The school nurse's roles and responsibilities should be agreed and clearly communicated with staff, pupils and parents.

School Nurses should receive Level 3 safeguarding training, as recommended by the GDST Safeguarding Committee at their meeting on 29 March 2017 and in the best practice guidance document 'Safeguarding Children and Young People: Roles and Competencies for Health Care Staff'. School Nurses attend termly clinical supervision provided by the GDST and are obliged by the NMC Code of Conduct to maintain and develop through the process of revalidation.

Given the nature of the school nurse's role and the possibility of one to one contact regarding personal issues, records must be fully and accurately maintained and be marked confidential. Accurate recording will help the school nurse demonstrate her decision making process when situations on a one to one basis with a pupil develop over a period of time and/or information needs to be shared with others or, if a pupil moves school, be transferred to the new school nurse/doctor.

School Counsellors, Welfare Officers and Medical Managers

Schools need to ensure that School Counsellors, Welfare Officers and Medical Managers are clear about the scope and nature of their role and that they receive adequate support and supervision, particularly if they are providing one to one counselling sessions to individual pupils. Expectations of record keeping should be the same as those set out above for the school nurse. A school Counsellor, Welfare Officer or Medical Manager who has any cause for concern about the pupil's safety or welfare **must report** this in accordance with the school Safeguarding Procedures. Schools need to ensure that systems are in place for the school

Welfare Officer / Medical Manager to liaise closely with the GDST Consultant Nurse and the Pastoral Deputy Head about any issue that is outside their areas of expertise.

Special Education Needs Coordinator (SENCO)
When the Designated Safeguarding Lead is alerted to concerns about an individual pupil, s/he should consult with the Special Educational Needs Coordinator if the concern is about a pupil who is on the SEN Register. However, the DSL should not delay following the child protection procedures whilst trying to gather information from the SENCO. Consultation with the SENCO would be particularly helpful in cases where the pupil has communication difficulties or behaviour problems.

B3. Safeguarding Communication Plan

Schools need to consider a variety of media and means of communicating their safeguarding strategy.

Staff and Volunteers
All staff and volunteers need to be properly equipped to respond to pupils sensitively and in accordance with the GDST Safeguarding Procedures. Schools (i.e. through the named Designated Safeguarding Lead) need to ensure that all staff and volunteers are familiar with and understand the Safeguarding Strategy and Procedures, through induction programmes, supervision, and ongoing support and training.

All teaching and support staff, visiting teachers and volunteers should be made aware of and have access to a copy of the full Safeguarding Procedures, including those whose role requires them to work outside the normal school day e.g. before/after school care, boarding duties and residential school trips. On appointment, all staff and volunteers receive a core set of information.

Step One
Staff/volunteers have a short briefing meeting with their line manager or supervisor about the Safeguarding Strategy and have an opportunity to clarify any queries.

Step Two
Staff/volunteers are given a copy of the core set of safeguarding information:
1. School Safeguarding Policy
2. Part One and Annex A of *Keeping Children Safe in Education*
3. Safeguarding Procedures Part A 'The Practice of Safeguarding'
4. Any other information relevant to their role and responsibilities.

For staff who cannot read English, or at all, schools should take steps to ensure they understand the key information.

Step Three
The staff member/volunteer must sign the Agreement to work in accordance with the School Safeguarding Policy (see Appendix B4a). A copy of this signed Agreement must be kept securely on the staff file.
There is a simplified version of the Agreement (see Appendix B4b) for staff who cannot reasonably be required to meet the expectations of the standard Agreement (e.g. because of limited English). The Designated Safeguarding Lead should take the decision on whether it is acceptable for specific members of staff to sign the simplified rather than the standard agreement, and ensure that the briefing the member of staff receives covers all the essential points of the policy and procedure documents.

Pupils
Pupils should be made aware of the GDST Safeguarding Policy through their programme of PSHE work, contribution to developing Codes of Practice, School Councils and other means of sharing information appropriate to their age and understanding (e.g. Student Planners and/or the Boarder's Handbook). Schools are encouraged to consult with pupils about strategies in order to make their school feel safe and inform day-to-day practice and the future development of the GDST Safeguarding Strategy.

Parents/Carers
Each school should communicate to parents/carers the scope and limitations of its responsibilities to ensure the well-being of pupils, and highlight that they also have responsibility for securing the welfare of their children. Parents/carers need to understand that the school may need to share information and work in partnership with other agencies when there are concerns about a child's welfare, and that it may be necessary to do so without their consent. Schools should provide information about the range of ways the school delivers pastoral care and approaches safeguarding pupils.

Communicating regularly with parents/carers about personal safety, health matters, PSHE / SRE, and the Safeguarding Policy helps to build a good foundation and two way flow of communication, should more sensitive issues need to be raised for individual pupils or for the whole school.

Generally, schools should involve parents/carers at an early stage should welfare concerns be identified. If there could be any reason not to involve or notify the parents/carers (e.g. because the concern may relate to a parent or other family member), advice should be sought from Social Services in the first instance, and the Legal Department if necessary, to establish whether it is appropriate to involve or notify them, or seek their consent at this stage. Further guidance is set out below in relation to Information Sharing and Consent and the Legal Department can also provide guidance.

Schools need to work with parents/carers to ensure appropriate support is identified and the nature and sources of support are explored with them and the pupil concerned (according to their age and understanding).

School Doctors and Nurses

School doctors and nurses should receive a copy of the School's Safeguarding and Child Protection Policy and these Procedures for their information. Schools should consider the role of their school doctors and nurses in relation to safeguarding, and ensure that they understand their obligations and their duties in accordance with the Information Sharing and Consent guidance. Schools should check the current job descriptions of these roles and contact Trust Office with any queries.

Members of School Governing Boards should receive a copy of their school's Safeguarding and Child Protection Policy and Procedures.

GDST Council Members will be provided with a copy of the *GDST* Safeguarding Policy and Procedures by Trust Office.

B4. Related Safeguarding Procedures

Anti-Bullying

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms but the main types are physical, emotional, verbal and cyber bullying. Bullying can cause considerable distress to pupils to the extent that it affects their health and development or in extreme cases cause them significant harm.

A bullying incident should be treated as a child protection concern where there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.' In such cases the incident should be reported and dealt with in accordance with these Procedures.

All schools should have in place rigorously enforced whole school Anti-Bullying strategies based on the School Anti-Bullying Policy, the GDST Anti Bullying Guidance and the DfE Guidance *Preventing and Tackling Bullying*.

Child Protection and Online Safety

The Internet offers a vital resource to pupils, staff and parents in terms of education and learning resources and for communication networks across the globe. However we also know that new technology gives people who are sexually interested in children a new medium to network, share information and fantasies, explore new identities and normalise their behaviour. This adds another dimension to the degree and nature of the risks to children. Developments in technology happen considerably faster than legislation and best practice guidance can keep up with and so it is imperative to remain vigilant about ongoing developments in this challenging area.

The GDST ICT Acceptable Use Agreements for staff and pupils, the Information Security and Data Protection Policies, the school Online Safety Policy, and the Communications including Social Media Policy aim to provide safeguards for the use of information technology both in and outside school. There is also a centrally managed system for filtering and monitoring internet use over the GDST network. A monitoring report can be generated by the system, and this must be run on a monthly basis as a minimum, with the DSL to be responsible for reviewing the report and acting on the outcomes where required. Schools are also strongly recommended to run the keyword search report daily.

There is growing concern about how technology can be misused to bully or harass, e.g. sending unpleasant e-mails or text messages, or posting comments or images on the Internet. The non-personal nature of communicating electronically seems to allow young people to behave in a way which would be far more difficult if they were having face to face contact.

To help address these problems **schools should ensure that they:**

- Educate pupils and parents of the potential dangers of the misuse of technology (e.g. digital photography, photographic mobile phones and web sites) and how they can protect themselves through curriculum delivery, specific online safety programmes, and special whole school events
- Educate pupils about cyberbullying, and treat cyberbullying as a safeguarding issue where appropriate
- Educate pupils about sexting, and make it clear that this is regarded as a child protection issue
- Ensure reporting procedures are accessible and well known to pupils
- Communicate any restrictions and consequent sanctions that may be imposed in order to promote the ICT Acceptable Use Agreement to all pupils (according to their age and understanding), parents and guardians
- Make pupils aware that the ICT Acceptable Use Agreement applies to behaviour towards staff and volunteers as well as pupils, both inside and outside school

- Encourage close liaison between school technical staff, the GDST central shared services team and Designated Safeguarding Leads in order to:
    - Be alert to guidance and best practice developments in this complex and evolving area
    - Ensure systems are in place and used to monitor, identify and respond to issues/concerns raised or suggestions to improve practice in their school

Any concerns about the misuse of technology by pupils or staff should be reported:

- *Pupils* should inform their Form Teacher or the Designated Safeguarding Lead
- *Staff and volunteers* should inform their line manager/ supervisor or the Designated Safeguarding Lead
- *The Designated Safeguarding Lead* should report to the Head.

A number of further sources of guidance are available:

- **Sexting in Schools and Colleges (UKCCIS)**
- **Indecent images of children: guidance for young people https://www.gov.uk/government/publications/indecent-images-of-children-guidance-for-young-people/indecent-images-of-children-guidance-for-young-people**
- **Cyberbullying: understand, prevent and respond (Childnet)**
- **Cyberbullying: advice for headteachers and school staff (DfE)**
- **The Professionals Online Safety Helpline (POSH) http://www.saferinternet.org.uk/about/helpline Tel: 0844 381 4772**
- **The UK Safer Internet Centre www.saferinternet.org.uk Helpline: 0344 381 4772 email: helpline@saferinternet.org.uk**
- **Report harmful content online https://reportharmfulcontent.online/**

- **CEOP's Thinkuknow website www.thinkuknow.co.ul**
- **Internet Watch Foundation www.iwf.org.uk**
- **Childline www.childline.org.uk**
- **UK Council for Child Internet Safety (UKCCIS) https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis**

Radicalisation and violent extremism

Schools have a statutory duty to have due regard to the need to prevent people from being drawn into terrorism[12], and GDST guidance has been circulated on British values and the 'Prevent' duty.

Any attempt to draw a child or children into terrorism should be treated as a safeguarding issue. Schools should provide training to enable staff to understand the risk and build their capabilities to deal with it, so that they have the knowledge and confidence to identify vulnerable individuals, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups. They should know where and how to refer children and young people for further help. The *Channel* guidance from HMG[13] provides further information, and *Prevent* awareness training will be a key part of this. Further support can be found via the channel e-learning general awareness programme[14] and the new website, Educate Against Hate http://educateagainsthate.com/, which gives practical advice for schools and parents.

The Prevent/Channel framework

1. Assessing the risk of radicalisation: taking account of the local context. This is best done in consultation with the Local Authority's *Prevent* Coordinator, and should take account of Counter-Terrorism Local Profiles.

[12] This can be found at https://www.gov.uk/government/publications/prevent-duty-guidance; see also https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

[13] https://www.gov.uk/government/publications/channel-guidance

[14] http://course.ncalt.com/Channel_General_Awareness/01/index.html

Considerations include whether parents have expressed concerns about vulnerability to radicalisation; whether there is any concern about parents or pupils expressing extremist views; and whether there are concerns about the vulnerability of any particular pupils or groups of pupils.

2. An action plan to reduce the risk of radicalisation: including protocols to:

- Prohibit extremist speakers/events at the school; establish clear protocols for ensuring that any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised (guidance on drafting a protocol for visiting speakers can be found in appendix B12)

- Manage access to extremist material – including **internet monitoring.** GDST schools use screening technology which filters all internet traffic coming through the school. Websites with militancy and extremist content should be screened through this system. In addition, the system can monitor requested internet access to radical sites by users of school systems. Pupils found wanting to access sites with radicalised content may be referred through the local *Prevent* referral process to *Channel*.

  (Every effort is made to filter extremist sites, and ensure that pupils are safe from terrorist and extremist material when accessing the Internet in school. The key word here is 'appropriate', given that pupils need to be educated in the use of the internet, and too high a level of filtering would impede wider educational aims.)

- Challenge extremist ideas that promote terrorism, through:
  - *Curriculum* – this overlaps with the ISSR requirement to actively promote British values through curriculum coverage, and to ensure balance and rule out egregious partisan expressions of views in teaching. Questions about extremism can be usefully addressed through PSHE.
  - *Pastoral provision* – ensuring that appropriate support exists for pupils
  - *School culture* – carrying through the British values of tolerance and respect.

3. Staff training to recognise signs of radicalisation/extremism, and to know what to do. Staff must have the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups. Staff should know where and how to refer children and young people for further help. Staff must understand when it is appropriate to make a referral to the *Channel* programme.

The Designated Safeguarding Lead must undertake *Prevent* awareness training, and be in a position to provide advice and support to colleagues.

4. Work in partnership: risk assessments and referrals should be made in liaison with other agencies. *Channel* is the multi-agency process designed to safeguard vulnerable people from being drawn into extremist behaviour, and works in a similar way to existing safeguarding partnerships.

Safeguarding arrangements must take into account the policies and procedures of local safeguarding partners.

Effective engagement with parents/the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with safeguarding procedures unless there is specific reason to believe that to do so would put the child at risk.

5. Establish referral mechanisms: schools need to be proactive in identifying vulnerable individuals, and working with local partners to develop appropriate support strategies.

The Channel process for referral and review can be described as follows:

Concerns --> School's Safeguarding Lead --> Discussion with local *Prevent* officer (Police/LA) --> Screening by Police *Channel* Coordinator --> Preliminary assessment by LA *Prevent* lead and Police *Channel* Coordinator --> Assessment and action plan by Multi-Agency *Channel* Panel --> Actions implemented.

Making referrals
Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the *Channel* programme.

An individual's engagement with the Channel *programme is entirely voluntary at all stages.*

Indicators of vulnerability to extremism and radicalisation
Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online. The Internet and social media have become a major factor in the radicalisation of young people. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

The *Channel* guidance describes the possible indicators of vulnerability to extremism and radicalisation, around the three dimensions of engagement, intent and capability:

1. **Engagement**
    a. spending increasing time in the company of other suspected extremists
    b. changing their style of dress or personal appearance to accord with the group
    c. their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
    d. loss of interest in other friends and activities not associated with the extremist ideology, group or cause
    e. possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups)
    f. attempts to recruit others to the group/cause/ideology
    g. communications with others that suggest identification with a group/cause/ideology.
2. **Intent**
    a. clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
    b. using insulting or derogatory names or labels for another group
    c. speaking about the imminence of harm from the other group and the importance of action now
    d. expressing attitudes that justify offending on behalf of the group, cause or ideology
    e. condoning or supporting violence or harm towards others
    f. plotting or conspiring with others
3. **Capability**
    a. having a history of violence
    b. being criminally versatile and using criminal networks to support extremist goals
    c. having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
    d. having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

School attendance: joining and leaving, action on absence, going missing

Registers and notification of pupils leaving and joining
Schools are required by law to have an admission and attendance registers. It is important that both registers are accurate and up to date. Schools should regularly encourage parents to inform them of changes when they occur.

There are specific regulations governing the information that should be entered on each register, and when the school should inform the LA of a pupil's absence from school or when a pupil's name is added to or deleted from the admissions register. Further information can be found in Annex A of *Keeping Children Safe in Education*, *School Attendance* July 2019 and *Children missing education* September 2016. Schools should check with their local authority to ensure they are following the correct local procedures for transmitting this information.

For compliance purposes, ISI will expect schools to be aware of the broad duty to notify/make returns to the local authority for all non-standard admissions and departures, to know or be able to ascertain the correct local channels for so doing, to be able to evidence that, if there have been any non-standard admissions or departures, the required notifications have occurred in accordance with local procedures, and that the school works co-operatively with the local authority in making returns as requested and reasonable enquiries where necessary.[15]

For practical purposes, wherever reasonably possible the school should hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice in that it provides additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

Action on school absence
The local safeguarding partners must be informed immediately if absence amounts to a safeguarding concern. The school must also inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 days or more. Failure to report children missing from education would constitute non-compliance with the duty to have regard to *Keeping Children Safe in Education.*

Children who go missing
Children who go missing from school with no explanation, or who fail to return after a planned absence, will be regarded in the first instance as an immediate safeguarding concern. Every effort must be made to locate the child, liaising with the police and welfare officers as appropriate. EYFS settings must have a published procedure to be followed in the event of a parent/carer failing to collect a child at the appointed time, or in the event of a child going missing at, or away from, the setting (EYFS Framework 3.73)

Schools must be aware of, and implement in full, the requirements of the statutory guidance for children and young people who are missing from home and/or from education which can be found at https://www.gov.uk/government/publications/children-missing-education. Local procedures for notifying the local authority and parents should also be followed. As with other safeguarding issues, comprehensive records should be kept and shared between the relevant agencies to help and protect children.

Schools may also find it useful to refer to the government's missing children and adults strategy available at https://www.gov.uk/government/publications/missing-children-and-adults-strategy

Support materials for a range of audiences are available from The Children's Society at http://www.childrenssociety.org.uk/what-we-do/resources/protecting-young-runaways

Failure to report children missing from education constitutes non-compliance with the duty to have regard to *Keeping Children Safe in Education.*

Provision of Information to a Pupil's New School

[15] ISI Commentary September 2019 para 311

Where a child moves, information sharing is important to ensure they get the support they need through and after the transition.

All maintained schools are required to send a CTF (Common Transfer File) to a new school when any pupil leaves, and there is a strong indication that independent schools with compatible IM systems should do the same[16] unless there are 'exceptional circumstances'. The school should also follow up by contacting the destination school to ensure the pupil has arrived.

In addition, information which will assist the new school in promoting the pupil's welfare should be transferred to the school securely, via CPOMS if this is possible. ' Child protection files must be transferred securely between schools as soon as possible, and separate from the main pupil file. Schools should obtain a confirmation of receipt.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of the child leaving. For example, information that would allow the new school or college to continue supporting victims or abuse and have that support in place when the child arrives.

Receipt of Information from a Pupil's Former School
Schools should in turn expect to receive information on new pupils from their previous school. A sample 'Pupil Record Request' form can be found in the Safeguarding/Best Practice folder in the Safeguarding section of the GDST staff intranet. Key staff such as designated safeguarding leads, Nurse and SENCOs should be informed of the new pupil's circumstances as required.

Looked after children and previously looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Looked after children need particular care to ensure they are safe and thrive in school, and there is a higher likelihood that they will experience periods of mental ill-health as a result of their early experiences. Where a school has one or more looked after children on role, the Head will ensure that:

- Relevant staff have appropriate levels of skill, knowledge and understanding needed to keep looked after children safe – and in particular have a good understanding of attachment issues (the statutory guidance for the Designated teacher for looked-after and previously looked-after children can be found here: https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children)
- There are mechanisms to ensure the views and feeling of the child are taken into account
- Appropriate staff have the necessary up to date information regarding each child, including their legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements (including the levels of authority delegated to the carer) and most recent care plan, and details of each child's social worker and virtual school head[17]
- The school is aware of the statutory guidance to local authorities about how they are to support schools with the care and education of these pupils, *Promoting the education of looked after children* available here: https://www.gov.uk/government/publications/promoting-the-education-of-looked-after-children

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

[16] *Children missing education* 2016 para 41
[17] The person discharging the local authority's duty to promote the educational achievement of its looked after children

Similar practice should be applied to any children on Child in Need or Child Protection Plans – i.e. these children would be subject to additional monitoring and records kept on arrival and collection times, a record of who drops off and collects, notes of late arrival and lack of attendance, record of existing injuries etc. Contact will be maintained with the relevant professionals.

Safeguarding on School Trips

The Safeguarding Policy and Procedures apply to off site activities as well as on the school site. In addition, schools should specifically address safeguarding considerations as part of the risk assessment for any trip, and ensure that any incidents are communicated, shared and recorded in the same way as if they had happened at school.

Considerations for all school trips:

- Schools should request and scrutinise the Safeguarding Policy of any activity provider used
- Written confirmation must be obtained from activity providers that their staff are suitably vetted according to their responsibilities and level of contact with pupils
- Parent (and any other) volunteers must be subject to the correct level of safeguarding checks, and briefed on relevant safeguarding procedures
- The list of pupils due to go on a trip must be reviewed by the nurse and DSL well in advance of the planned date in case there are physical or mental health concerns the trip leader may not be aware of. Where a pupil's physical and/or mental health presents an additional risk, this should trigger a separate risk assessment, and arrangements must be discussed and formally agreed with parents. Schools should bear in mind the implications of the Equality Act in assessing the situation, and contact the Legal Department if advice is needed.
- Schools should ensure that the pre-trip briefing explicitly addresses safeguarding and personal safety, including, if travelling abroad, advice on differing cultural norms and communicating personal boundaries. This should be followed up with written guidance for reference.

Additional considerations for hosting arrangements:

- Host families in the UK must be vetted as required by Keeping Children Safe in Education (see Safeguarding Procedures section B5)
- The DBS cannot access criminal records held overseas. Host families in other countries cannot therefore be checked in the same was as those in the UK. Schools must ensure that any host school has a procedure in place to assess the suitability of homestays and obtain confirmation of this in writing. This should then be communicated to parents and carers with their written agreement obtained to confirm they are satisfied with the hosting arrangements and the way in which the hosts have been identified
- The list of pupils due to stay in a host family – or receive a return visit – must be reviewed by the nurse, DSL and Head at an early stage to check whether there are any health, pastoral, safeguarding or other concerns relating to the pupil or host family
- Families and pupils should be carefully matched for gender, age, diet, religious belief, special needs etc.
- Host families in the UK and abroad should provide suitable information about the home setup and any activities they may have planned for their guest during the homestay. It must be made clear that the pupil should have her or his own bed in a room of someone their own gender and age appropriate, or a separate bedroom
- Families must have been given the opportunity to contact each other prior to the acceptance of any arrangements, and should be made aware that they do not have to agree to these. Parental consent should be required for higher risk activities such as horse riding or sailing.

- Exchange visit leaders should have daily contact with all pupils. Pupils should have access to a phone at all times and provided with an emergency number they can call or text at any time. There should also be an agreed 'keyword' pupils can use which means 'I want you to visit me immediately'
- Ensure there are contingency plans in place in case it is necessary to move a pupil at short notice

School Security

A whole school approach to developing and maintaining school security can, as well as strengthening certain components of the school security procedures and systems, help make the Safeguarding Strategy more robust. This should include ensuring that:

- Systems are in place to meet current requirements and are rigorously adhered to, such as door codes, use of visitor passes etc.
- All concerns raised by parents and pupils or neighbours are properly recorded and addressed
- Access is controlled, particularly at vulnerable times of the day such as before and after school hours and during extra curricular activities
- Staff working at vulnerable times of the day are adequately supported with sufficient numbers of adults, relevant information, access to keys, and mobile phones if necessary
- Re-evacuation procedures (i.e. getting pupils swiftly and safely back into the school building) have been developed and practised to respond to the unlikely event of an unwelcome intruder
- Staff/ volunteers (e.g. estate staff and playground supervisors, before/after school care providers) receive information and/ or training (as appropriate to their role) on how to deal with intruders
- There is a scheduled programme of checks for spy cameras in toilets and changing rooms[18]
- The SLT are proactive in liaising with local police at sufficient level of seniority and work towards developing positive relationships and consistency of practice.

[18] Notes of guidance on checking for spy cameras can be found in Appendix B13

B5. Preventing Unsuitable People from Working with Children

DBS Disclosures

Any person whose duties include *regularly* caring for, training, supervising or being in sole charge of children or who is in a position to build up a relationship of trust with a pupil, must have an enhanced DBS disclosure, with a Children's Barred List Check for the Child Workforce. A regular basis is defined as either frequently, or periodically (i.e. once a week or more often, more than 3 times in a 30 day period), or overnight[19] (even if only one night is involved). However schools should also bear in mind that there are some activities that occur less frequently but could allow a relationship of trust to develop, e.g. once a month over a prolonged period. In such cases an enhanced DBS check should be sought, although a Barred List Check is not available. The HR and Legal Departments can advise in the event of doubt.

When should schools apply for a DBS disclosure?
In most circumstances, the school should apply for the check as soon as practicable after an appointment is made. In cases where a member of staff is appointed a long time before they are due to start work, it is not prohibited for schools to apply for a check on appointment even if this is three months before the employee takes up their post. However it would be seen as best practice to undertake the check closer to date they start work.[20]

How to apply for a DBS check – via an online application or a 'status check' from the DBS Update Service
All those requiring a DBS disclosure should be asked to apply for a new check, via the DBS application process, unless they are subscribed to the DBS Update Service by which schools may do an online check subject to certain conditions.

DBS online application process
This is by completion of an online DBS application form, completed by the individual and a designated administrator at the school. The GDST's online provider is Atlantic Data. Instructions and full details of the process are available from the HR Co-ordinator at Trust Office, who administers the contract with Atlantic Data. As part of the process, applicants must provide relevant and original documents, which are checked by a designated administrator at the school.

Depending on the selections made on the online form, it is possible to obtain an **Enhanced DBS check** with a **Children's Barred List check** and a **Prohibition from Management check in one.** If all three checks are required, administrators must be sure to select the 'independent school' option in the role section of the form. There is also the option to do an Enhanced DBS check with a Children's Barred List check together, for those in regulated activity, either paid or unpaid.

The facility to do separate Barred List checks or Prohibition from Management checks using the Atlantic Data system is not available and the details of how to do these individually if needed is covered below.

Applicant only DBS Certificates: DBS certificates are issued only to applicants and copies are not sent to employers. Schools must therefore ask individuals for sight of their original DBS Certificate once it has been received. Copies of the certificate provided by individuals must not be accepted. Original certificates should be checked for authenticity. A DBS certificate contains a number of security features, which can be used to verify its authenticity:

- A crown seal watermark on the right hand side of the document.

[19] This definition has been amended from 3 or more days in a month in response to the Singleton Report. Ref. SI2010/1154 a1(1)
[20] ISI Commentary September 2019 para 372

- A background design incorporating the word 'Disclosure' which appears in a wave-like pattern and alternates between pink and green on the reverse side.

Certificates should be handled only by countersignatories or nominated office staff as per the DBS Code of Practice.

What to do if there is a delay in obtaining the DBS disclosure[21]

Wherever possible, an enhanced DBS disclosure should be obtained prior to the individual starting work, and must in any event be obtained as soon as possible after the appointment. However, Heads may at their discretion allow an individual to begin work (without confirming the appointment) pending receipt of the enhanced DBS disclosure provided that:-

a. The Enhanced DBS application has been submitted in advance;
b. A Barred List check for the Child Workforce has been undertaken[22];
c. All other possible checks have been completed; and
d. Arrangements are made for appropriate supervision (see below).

In such circumstances a note should be added to the central register and evidence kept of the measures put in place.

Appropriate supervision whilst awaiting DBS clearance

Schools must take a risk based practical approach depending on the circumstances of the particular individual (taking into account factors such as their experience, the nature of their duties, references, the level of responsibility/contact with pupils they will have and the age of the pupils concerned[23]). The arrangements should be reviewed at least every two weeks until the DBS disclosure is received. A risk assessment should be kept on the individual's file of the factors considered, and the arrangements made, together with any evidence (a risk assessment form can be found in the Central Register Documentation folder on the Safeguarding section of the GDST staff intranet). This record should be updated at each review until the DBS disclosure is received. A note should also be added to the central register of appointments. The individual in question should be informed of the safeguards put in place in their case.

Using the DBS Update Service – doing 'status checks'

The DBS, from 17 June 2013, introduced an Update Service, which allows employers to check the status of criminal records online, providing the individual already has a DBS certificate, has subscribed to the Update Service and given consent for the check.

The online 'status check' will reveal if the DBS Certificate remains accurate or if any new information has come to light since it was issued, without having to apply for another DBS certificate through the normal application process. However, the service will not provide the facility to update employers automatically of any new criminal information throughout the individual's employment or period of engagement.

The service is free for employers and volunteers although other individuals are required to pay an annual subscription fee. The GDST will not reimburse individuals for the fee.

In order to do a 'status check', schools will need to see the original DBS certificate and must be entitled to obtain a DBS check of the level and type needed, e.g. enhanced DBS check including a Barred List check for the Child Workforce. If the DBS certificate is not at the appropriate level a new certificate must be applied for (to include the Barred List check). If the DBS certificate is at the appropriate level but does not include barring information for the children's workforce, a separate barred list check must be undertaken. Consent

[21] ISI Commentary September 2019 para 373-375

[22] Schools can obtain a Barred List check by registering with TP Online, an online instant checking service against the Barred List. There is an annual fee for subscription. Further details of the process can be obtained from the HR department.

[23] If the school has received official advance information from the DBS or a registered umbrella body that the DBS certificate has been issued and contains no information, it will be reasonable to take this into account when assessing safeguards which are appropriate (ISI Commentary September 2019 para 370)

must be obtained from the individual, either verbal or written. An Applicant Consent Form for this purpose is provided (available in the Central Register Documentation folder of the Safeguarding section of the GDST staff intranet).

To make a 'status check' only the checker's name and the name of the GDST is needed, together with the applicant's name, date of birth and DBS certificate number. Schools should check that the original certificate matches the individual's identity and refers to the appropriate level of check and workforce. 'Status checks' should be done only by countersignatories or nominated office staff. Schools are advised to print and keep a record of the 'status check' result, which must be handled and kept confidentially following the DBS Code of Practice. If the status check indicates that there has been a change since the certificate was issued, the individual must apply for a new certificate.

Full details of the Update Service, including a guide for employers and applicants, and frequently asked questions, may be obtained from www.gov.uk/dbs

The GDST does not require employees or volunteers to subscribe to the Update Service. However, since January 2014 we have required self employed individals to subscribe, and to give consent for an annual check to be made. Schools must undertake annual DBS status checks on all these individuals; it is thought that the summer holiday period is the opportune time to do so, in advance of appointments re-commencing in September. The GDST does not reimburse the cost of the annual DBS subscription fee for self-employed individuals.

Can an existing DBS disclosure ever be accepted for a new appointment?
Schools are strongly advised to obtain a new DBS disclosure for all new appointments or, if the individual is subscribed to the Update Service, to do an online 'status check' as set out above. However, if the new member of staff already has an enhanced disclosure from a previous employer, but is not subscribed to the Update Service, this may be accepted provisionally, pending the arrival of the new disclosure **provided that**:

- He/she has not been out of the workforce of an educational establishment for more than 3 months AND;
- it is an enhanced disclosure;
- a separate Children's Barred List check has been completed[24]
- the original enhanced disclosure is seen – photocopies are not acceptable;
- the disclosure was issued in the last 3 years;
- the applicant has not changed his/her name since the last disclosure was obtained;
- the applicant is still at the same address;
- there has been no gap in employment, or there has been no intervening employment which did not require a disclosure since the previous disclosure was issued;
- the disclosure was obtained by a reputable previous employer or umbrella body;
- satisfactory references have been received from the previous employer.

In all other circumstances a new enhanced DBS application will need to be made before the member of staff can be employed without appropriate supervision (see above). ***Note this does not apply to boarding staff, for whom DBS disclosures are not portable.***

You may need to check whether any "additional information" was included. An Applicant Consent form (available in the Central Register Documentation folder of the Safeguarding section of the GDST staff intranet) should also be completed. The previous employer will only be able to confirm whether the information on the copy of the disclosure provided to you by the applicant matches their records, and whether or not any additional information was supplied. If additional information was supplied, a new

[24] ISI Commentary September 2019 para 368-9

disclosure must be requested. In these circumstances, the applicant should not be informed of the reason why a new disclosure is required. If you experience any difficulties in obtaining disclosure information from a previous employer, you may wish to consider asking the applicant to make a fresh application.

What if the DBS disclosure contains information?
If the DBS disclosure includes information on offences committed by the applicant, the Head must undertake a formal written risk assessment as to whether to employ that person**,** being mindful of GDST policy on the employment of ex-offenders, and seek advice from HR. If the decision is made to confirm the offer of the post in question, the risk assessment must be kept securely on the relevant personnel file.

How long is a DBS disclosure valid?
DBS disclosures do not 'expire', but provide a snapshot of information that is available on the date of the certificate. As long as a school employee is in continuous employment they do not need to be rechecked unless there is a concern about their suitability to work with children. **However**, anyone out of employment for a period of 3 months or more must be re-checked - this will have implications for supply staff, exam invigilators, casual workers and the like**.** For these individuals, subscription to the DBS Update Service would be advantageous as, once the DBS certificate has been issued, periodic 'status checks' will be easy and quick to obtain. Alternatively, bringing in occasional workers periodically (i.e. within the three month interval), for training for example, maintains our connection with them and means that a DBS recheck is not required. A teacher working for a supply agency is required to have a new DBS check every 3 years (or earlier if there are grounds for concern or a break in service for 3 months or more). Members of staff on maternity, shared parental leave or long term sick leave are not out of employment and do not need a new DBS disclosure to return to work. See below for advice on workers on zero hours contracts.

Should DBS certificates be retained or copies made and kept on file?
This is not a requirement, but it is permissible and schools may choose to make and keep copies for a limited time. If copies are made, they must be handled, kept confidentially and destroyed securely after six months, in accordance with the DBS Code of Practice. As noted above, from 17 June 2013, DBS certificates have been issued only to applicants and copies are no longer sent to employers. In order to make the check schools should ask individuals for sight of their original DBS certificate.

Circumstances where DBS Disclosures or Barred List Checks are not necessary:

- Some categories of volunteer (see below)
- Visitors to the school (e.g. children's relatives or other visitors attending a sports day). Heads should use their professional judgement about the need to escort or supervise visitors[25] (however note that visitors to boarding accommodation must be kept under sufficient staff supervision to prevent them from gaining substantial unsupervised access to boarders or their accommodation)
- Building and other similar contractors attending school who come onto site only to carry out emergency repairs or service equipment and who are not left unsupervised (health and safety reasons do not allow pupils in areas where builders are working and therefore builders should generally have little opportunity for contact with pupils). However the school should ensure arrangements with the contractors are in place to make sure **any workers potentially coming into contact with children** have appropriate checks and/or are appropriately supervised at all times. (For further information on contractors see below)
- In certain circumstances, secondary pupils undertaking voluntary work experience with younger pupils in the school (or another school) - see below for further details. Sixth formers **from age 16** undertaking **paid work** with children **must** be DBS checked
- People on site before/after school hours when pupils are not present e.g. members of the public attending groups using the school as hired premises[26]
- Students (pupils) aged eighteen or over studying as pupils
- Existing regular volunteers continuing with old duties

[25] *Keeping Children Safe in Education 2019* para 184
[26] However see section below on Clubs regarding checks on groups hiring premises and their employees

All visitors to the school should be signed in at reception and wear a visitor's badge whilst on site. It is good practice for badges to include a statement of the school's commitment to safeguarding and child welfare, and information about what to do if the visitor is concerned about a child or receives a disclosure.

Other Checks, Maintenance of the Single Central Record and Staff Files[27]

- **Schools must maintain a single central record** of safeguarding checks
- All schools are expected to use the designated GDST HR system to produce the SCR report
- All required columns on the register should have an entry for **every** member of staff. Not applicable 'N/A' should be entered where the particular requirement was either not relevant to the appointment in question or was not in force at the time of the appointment. No evidence 'N/E' should be used where there is no evidence for a check having been carried out. However, where this is the case, and where it is possible to close the gap retrospectively, this should be done, and evidence put onto file. Do not leave spaces blank or put 'No' in a column, which indicates that a regulatory check was required but has not been carried out.

Categories of staff who should be included on the central register:-

- Teaching Staff (full and part time), including the Head
- Support Staff (full and part time) - this includes those who do not work directly with children such as caretakers
- Agency workers (i.e. individuals supplied by an employment agency)
- Self Employed (individuals such as peripatetic teachers and sports coaches) including those brought into school to provide additional teaching or instruction (such as an artist in residence)
- Volunteers – this is not a statutory duty but a GDST requirement[28](for further information on volunteers see below)
- Members of School Governing Boards
- Proprietors (members of the Council of the GDST. Information relating to Council members will be provided by Trust Office via the HR Department)

Details of the employment checks carried out for Heads – including DBS checks – needed for the central register can be obtained from the HR department at Trust Office

Different information must be checked and retained on file depending on the category of staff/individual and their date of appointment. Please see further below for detailed notes on the required checks for each category of staff. A summary of the required checks are set out in grids for each category of staff at Appendix B7.

What information is required on the register?

Evidence of a check having been carried out: stating the checker, and date **the check was made** for:

- **Identity check** - Birth certificate / driving licence / passport[29]
  - Evidence of address

  Ensure you cover name, date of birth, address, photographic identity
- **Children's Barred List** - NB this must be entered on the record where there is a separate date from the DBS check. Where dates are the same, do not leave the box blank – put the date of the DBS check or 'as DBS'
- **Enhanced DBS** Disclosure make a record of:

[27] A summary list of all pre-employment checks and how to undertake them can be found in appendix B8b

[28] *Keeping Children Safe in Education 2019* para 151

[29] PRADO at http://www.consilium.europa.eu/prado/en/prado-start-page.html?mc_cid=2ce14554eb&mc_eid=668cd8c8ad is a website created by the EU to help identify genuine identity documents with examples from across the world

- Date certificate is seen (most schools also record the date on the certificate)
- Who obtained
- Level of disclosure
- Unique reference number

- **Prohibition from teaching check (see below)**
- **Prohibition from management check (see below)**
- **Childcare disqualification check (see below)**
- **Proof of qualifications** - that are a requirement of the post (when carrying out the checks, copies are only acceptable if properly certified). Any award of QTS and completion of teacher induction and probation should be verified via the Teacher Services system. Where relevant a note should be added to the SCR to confirm that the qualification check included the QTS check.
- **Right to work in the UK**[30]
  An identity and Right to Work check must be carried out on the day of the interview for **all** candidates, in order to ensure there is no discrimination in the process.
  Paper documents may be accepted from UK nationals, and EEA nationals who have not been granted settled status under the EU Settlement Scheme. From 28 January 2019, with the applicant's permission, the government's Online Right to Work Checking Service must be used for applicants who are non-EEA nationals and EEA nationals who have been granted settled status under the EU Settlement Scheme. Full details of how to do an online check are available here **https://www.gov.uk/employee-immigration-employment-status**
  Photocopies of either the original documents submitted (checked for authenticity) **or** a copy of the online check, with a record of the date on which this check is conducted, must also be made. This date may be written on the document copy as follows: *'the date on which this right to work check was made: [insert date]'* This evidence - of the photocopy or online check printout - and the date on which the check was made must be available on request by the Home Office in order to establish a statutory excuse. The GDST may be liable for a civil penalty if the date when the check was performed is not recorded.
  An employers' guide to right to work checks is available from the Home Office via **https://www.gov.uk/government/publications/right-to-work-checks-employers-guide**
- **Overseas check, including a check for EEA teacher sanctions and restrictions (see below):**
  Under a requirement in force since August 2007, for staff recruited since September 2003, if the member of staff **is joining the school from overseas** or has **lived outside the UK** for **3 months or more in the last 5 years (as a rule of thumb)**[31] in addition to the above checks they should be subject to **additional checks**, taking into account the relevant guidance[32]. Where the DBS disclosure will not be sufficient (i.e. because it will not cover offences committed abroad) the school should obtain whatever evidence of checking is available from those countries where the individual has lived/worked, for example criminal record checks in the country in question where these can be made, additional references, certificates of good conduct or equivalent from the relevant country's embassy, following references up by phone. The Home Office has published updated guides on what checks are available from different countries, which are available at https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants
  Some checks can only be applied for by the member of staff themselves, in which case it can be useful to get them to confirm in writing that they have made an application.

[30] See also the Home Office guidance for employers on right to work checks https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/773780/An_employer_s_guide_to_right_to_work_checks_-_January_2019.pdf Schools will additionally need to be aware of their obligations under the UK Visas and Immigration Points Based System when employing non EEA members of staff

[31] The ISI Commentary now notes that this is 'a starting point for compliance' but that many schools have adopted a more stringent approach such as checking those who have lived or worked overseas for more than three months in the last 10 years (September 2019 para 396)

[32] ISI Commentary September 2019 paras 395-399

Where a member of staff has worked in a school since returning from overseas, the usual checks for school staff can be made for subsequent appointments (if they worked in the UK since returning from abroad, but not in a school, overseas checks will have to be carried out).
The DfE has also issued guidance on the employment of overseas-trained teachers from outside the European Economic Area to teach in England, and the award of qualified teacher status for teachers qualified in Australia, Canada, New Zealand and the USA. This is available at https://www.gov.uk/government/publications/employing-overseas-trained-teachers-from-outside-the-eea
For compliance purposes, schools can be taken to have 'had regard' to the government's guidance if the relevant application has been made before the person starts work, whether or not any response is received. However in the absence of a response from official sources overseas, schools must obtain alternative further checks (e.g. additional references) before the person starts work.

Note that **all** the **above checks** must be completed **before appointment except the DBS check**.

Schools should also check in advance of appointment and record:

- **References** (NOT open testimonials etc.). *Keeping Children Safe in Education* does not specify a number of references but implies that there will be more than one. For inspection purposes the usual expectation is that there will be a minimum of two, subject to any 'exceptional circumstances'. **Schools should not allow staff to start work until these references have been received.**
  Template reference requests for teaching and support staff are available in the HR area of the GDST staff intranet and must be used as they contain the relevant safeguarding information requests.
  References should always be obtained from the candidate's current employer if they are employed. They should always be requested directly from the referee and preferably from a senior person with appropriate authority, not just a colleague. Where a candidate is not currently employed, verification of their most recent period of study, volunteering or employment and reasons for leaving should be obtained from the school or other organisation at which they were employed, volunteered or were enrolled. A telephone reference is acceptable, provided that detailed notes are taken, dated, signed and filed. Ensure in the notes that it is made clear who was spoken to.
  Suitability references should also be sought for internal candidates, and scrutinised as for external candidates. Internal references are permissible where appropriate: it can be more instructive to enquire of current colleagues whether they have any suitability concerns, particularly when colleagues from former employers are uncontactable due to passage of time.
  References should include a request for any reason why the applicant should not be employed to work with children, details of any capability procedures in the previous two years and the reasons for these, details of any previous allegations (excluding those unfounded, unsubstantiated or made maliciously), and details of any current concerns which are not subject to the publishing restriction in the Education Act. In relation to current allegations of misconduct against a pupil which cannot be published due to the restriction in the Education Act, referees should be asked to inform the investigating authorities in order that the school may be informed separately of any concerns.
  References should be checked on receipt to ensure that they **have been signed**, and all specific questions have been answered satisfactorily, with appropriate follow-up where required[33]. Schools should not rely only on information provided by the candidate as part of the application process without verifying that the information is correct. Where electronic references are received schools should ensure they originate from a legitimate source.
  The date for the reference check recorded on the SCR should be the date of the **receipt of the second reference**. It is good practice to also record the date of the receipt of the first reference in the notes field.
- **Previous employment history** (from the application form – CVs in isolation are not now acceptable). For self employed individuals and others engaged but not employed by the school,

[33] See *Keeping Children Safe in Education* 2019 paras 144-147 for further guidance

instead of an application form use the 'Safeguarding Information Form' available in the Central Register Documentation folder in the Safeguarding section of the GDST staff intranet.

- **Medical fitness appropriate to post**[34] Anyone who will have regular contact with children must be medically fit. The school must satisfy itself that the individual has the appropriate level of physical and mental fitness before an appointment offer is confirmed. Appointees must complete and return the medical questionnaire (Form S4). Other individuals may complete a simple declaration such as 'I know of no reasons, on grounds of mental or physical health, why I should not be able to discharge the responsibilities required by my post.' Note that for directly employed staff as part of the Sickness Absence and Ill Health Procedure, which forms part of the employment contract, an existing employee should inform his or her line manager if s/he considers that s/he is affected by a disability, medical condition or medication that affects his or her ability to undertake his or her work. If a staff member changes post within the school a new declaration may need to be made.
- For agency staff, evidence of appointment checks from the agency supplying the member of staff
- Interview with written record of outcome

Checks of previous employment history and references are no longer specified in the regulations, but are required as 'having regard' to *Keeping Children Safe in Education*. This permits some limited flexibility in 'exceptional circumstances'[35]

Prohibition from teaching check (and other sanctions and restrictions)

For certain categories of staff and self-employed teachers, schools must also make a pre-recruitment check with the Teaching Regulation Agency (TRA) to view the record of a teacher to ensure that:

- an active restriction does not apply (whether imposed by the Secretary of State or the GTCE prior to its abolition in 2012),
- the teacher is not prohibited from teaching,
- the teacher is not the subject of a current suspension or conditional order, and
- the teacher has not failed to successfully complete their induction period.

The TRA provides these checks via a service called Teacher Services (formerly Employer Access), which is a free service for schools in England.[36] Schools need to be registered to use Teacher Services and in order to register to use the service schools should email the TRA at **employer.access@education.gov.uk** with their:

- school name
- postal address
- school DfE number
- head teacher's name and email address

Once the school has been registered, the TRA will email an organisation number and validation code which can then be used to create an account via https://sa.education.gov.uk/idp/Authn/UserPassword

The check should be made on **anyone** carrying out 'teaching work'. 'Teaching work' involves **any of the following**:

- planning and preparing lessons and courses for pupils
- delivering and preparing lessons to pupils
- assessing the development, progress and attainment of pupils

[34] ISI Commentary 2019 paras 378-381

[35] ISI Commentary September 2019 para 382

[36] The TRA prohibition list online includes those teachers who are prohibited from Northern Ireland, Wales and Scotland. When a teacher in England has been prohibited from teaching, the TRA will also inform teacher monitoring services in Northern Ireland, Wales and Scotland. Note that Scotland has a range of different sanctions, including prohibition. Whilst the TRA lists those teachers who are prohibited, they do not hold information on teachers who have been through the regulatory process in Scotland and may have been sanctioned rather than prohibited. If necessary, schools should contact the General Teaching Council Scotland for information. Independent schools in Wales should also check with the Education Workforce Council (EWC) to see if a practitioner has been prohibited in Wales or not.

- reporting on the development, progress and attainment of pupils

"Delivering" includes delivering lessons through distance learning or computer aided techniques.

These checks apply not only to regular classroom teachers but also to others who carry out 'teaching work' – including peripatetic music teachers, sports coaches etc.

However, none of these activities is "teaching work" if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the head teacher. Teaching assistants are unlikely to need a prohibition check as it is likely that their work is carried out under direction and supervision. Schools should, therefore, decide on a case by case basis, in the light of their own practice relating to teaching assistants, whether their assistants require prohibition checks. Similar reasoning would also apply to those employed as sports coaches or similar posts.

Although QTS is not a requirement for teachers in the independent sector, any member of staff undertaking teaching work – whether they are qualified as a teacher or not – should be checked. Where a candidate has a QTS registration the number must be used to undertake the check. Without QTS, a teacher will not have a reference number. In such cases this is what to do. Checks of the prohibition list are done through Teacher Services. A webpage within the Teacher Services site requests the date of birth and reference number of the person being searched. To the right of that page is a list of three links. The bottom-most link takes the searcher to the prohibition list. Click on that link. On the prohibition list, prohibited teachers are currently listed alphabetically by surname. Scroll down the list to find (or otherwise) the name sought. Clicking on the reference number adjacent to the name would then take the searcher to more information about the sanctions that have been imposed. If a teacher without a reference number has been sanctioned, the TRA will have generated a number for them for the purpose of the disciplinary process. That is why it appears that only people with QTS are on the list.

Retrospective checks should have been undertaken for relevant staff appointed from 1 April 2012.[37]

The Single Central Register has an additional field for recording this information.

Check for EEA teacher sanctions and restrictions
An EU directive introduced a new requirement on European Economic Area (EEA) authorities, which have responsibility for regulating the teaching profession, to share teacher prohibitions/sanctions with other EEA teacher regulators.

As part of this requirement, and to support safer recruitment considerations, from 18 January 2016 a new service functionality was introduced to Teacher Services (formerly Employer Access Online) that allows schools to identify teacher restrictions imposed by all EEA authorities in addition to the normal teacher prohibition pre-appointment checks detailed at part 3 of *Keeping Children Safe in Education* statutory guidance. Only EEA sanctions made after 18 January 2016 will be shown.

Employers will need to access the "Teachers sanctioned in other EEA member states list" to identify restrictions in force. Where the employer holds a teacher reference number and date of birth the general search function can now be used.

[37] This check was introduced in April 2014 as part of having regard to KCSIE and from January 2015 by the ISSRs. In late January 2015 the DfE asked schools to do this check on teaching staff appointed since 1 April 2012. The ISI Handbook notes that those appointed between April 2012-14 will not have been carried out pre-appointment through no fault of the school and schools are not to be found non-compliant on that account. (ISI Commentary September 2019 para 402)

Restrictions imposed by another EEA authority do not prevent an individual from taking up teaching positions in England. However, schools should consider the circumstances leading to the restriction when considering a candidate's suitability. Teacher Services explains how to get additional information about EEA restrictions.

This check is recorded on the SCR as part of the overseas check. In order to demonstrate that this particular check has been completed, schools are recommended to record this in the notes field.

Prohibition from management check[38]

From 12 August 2015, schools must make checks on individuals appointed (internally or externally) to relevant posts for the existence of directions made by the Secretary of State under s.128 of the Education and Skills Act 2008 barring individuals from taking part in the management of an independent school (including academies, which are in legal terms independent schools).

These checks apply to:

- members of proprietor bodies (in the GDST, these are Trustees or members of the Academy Trust Board)
- head teachers
- teaching and support staff positions on the senior leadership team
- teaching positions which carry a department headship[39]

Other individuals such as teachers with additional responsibilities may be considered as taking part in the 'management' of the school – in such cases it is up to the school to decide whether the check should apply depending on the nature of the position they hold.

Furthermore, whilst the DfE's directions make a distinction between members of proprietor bodies and governors, where governors are not members of the proprietor body, the *Independent School Standards Guidance* (April 2019) appears to widen the application of the check.[40] GDST policy has accordingly been revised and from September 2019 new appointments to the School Governing Board should be checked for prohibition from management and these checks must be recorded on the SCR. There is no need to check existing members retrospectively.

Any s.128 directions made by the Secretary of State will show up on checks made with the Disclosure and Barring Service (if a Barred List check is made) and the TRA (the latter check can be done whether or not the person concerned is a teacher).

Which check to make:

- For individuals not in regulated activity, only the TRA route is available
- For individuals in regulated activity, the DBS route can be used but the TRA route is also perfectly adequate and may serve as a useful alternative for schools since it is quick and free
- For a member of the proprietor body (i.e. Trustees or the Academy Trust Board) the TRA route should be used (these checks are carried out by Trust Office)

It is important, when submitting an online application for a DBS check for such a role, that the 'Independent School' option is chosen from the drop-down menu in the role section of the online form. This allows the DBS to confirm if an s128 direction has been made.

---

[38] The DfE letter regarding the check can be accessed here

[39] There is no specific definition available of 'departmental headship'. Schools are expected to take 'a reasonable approach in the context' (ISI Commentary September 2019 para 410)

[40] 'For non-teaching staff, only posts which are part of the senior leadership team or staff who otherwise occupy roles as 'governor', member of a proprietorship board, or equivalent oversight or management grouping, by whatever title, should be regarded as 'management' for the purposes of checking for the existence of a barring direction.' (5.4)

TRA checks can be made via Teacher Services. Once logged in, it is possible to access three separate lists with details of teachers and a few non teachers who have a current restriction against them in relation to teaching in England. The list relating to 'teachers or others who have been prohibited from teaching', although primarily designed to be of those prohibited from teaching, will also show s.128 directions.

It is not necessary for schools to check existing staff or members of proprietor bodies, or staff recruited and vetted before 12th August 2015, for the existence of an s.128 direction, unless they are in future promoted internally to a post for which a check is needed.

Childcare disqualification requirements

Junior school staff, SLT members, and agency/supply staff will be subject to the disqualification provisions of the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018 if they provide relevant childcare, which means they:

- work in early years provision (which includes teaching or supervising children from birth until the 1 September following their fifth birthday) either during or outside school hours, including in school nursery and reception classes, **or**
- work in later years provision outside school hours for children who have not attained the age of 8. For this age group, only provision which would be considered 'childcare' (i.e. crèche-like facilities) is relevant. Co-curricular learning activities, such as sports clubs or a school choir, are not within the scope of the regulations,
  or
- are directly concerned in the management of such provision (for example as part of the school's SLT) even though they may not work in the early years or relevant later years provision themselves.

The disqualification provisions apply to regular volunteers, self-employed contractors and casual workers who provide relevant childcare, but do not apply to caretakers, cleaners, drivers, catering or office staff who are not employed to provide childcare, nor to school nurses or staff who are not regularly required to provide relevant childcare.

Schools may not knowingly allow people to work in these settings, or to be directly concerned in their management, if they meet any of the following disqualification criteria:

- They have been placed on the children's barred list.
- They have been cautioned for, convicted of, or charged with certain violent and sexual criminal offences against children and adults, at home or abroad (relevant convictions will never be considered "spent" for these purposes).
- Other orders have been made against them relating to their care of children.
- They have had their registration cancelled in relation to childcare or children's homes or have been disqualified from private fostering.

From September 2018, schools are no longer required also to establish whether relevant members of staff are disqualified 'by association'. Schools should no longer ask staff questions about cautions or convictions of those living or working in their household. These procedures and Form CDD (Appendix B10) have been updated accordingly.

Disqualification takes effect as soon as any of these criteria are met, for example, as soon as a caution or conviction occurs, even before the person is included on the children's barred list.

Disqualified staff may apply to Ofsted for a waiver from disqualification, but may not continue to work in (or manage) the early or relevant later years provision unless and until a waiver is granted.

Action required:

- Staff should be made aware of the DfE guidance Disqualification under the Childcare Act 2006, which includes further details of the disqualification requirements and the process for obtaining a waiver, including Ofsted guidance. Attention should be drawn to the section that explains that staff are not

required to disclose details of protected convictions, and should not provide details of any spent convictions.

- Schools should remind staff regularly of their duties to disclose any relevant information – the DfE does not prescribe any particular approach to reminders but recommends an annual check as a 'sensible measure'[41]. A record of this reminder should be made. In addition, schools should undertake re-checks from time to time: this is not just a pre-appointment check. No particular time has been set by the DfE for repeat checks, so schools can 'exercise reasonable discretion'.[42]
- Completion of childcare disqualification declaration form CDD (see appendix B10) is now part of the pre-employment checks undertaken on appointing new staff to affected posts. Applicants for a post must complete the form as part of their application (for details of the process see the HR section of the GDST staff intranet 'Recruitment and Selection'). If appointed the form must be kept as evidence on the member of staff's file. Person specifications will need to make it clear that affected posts are subject to the childcare disqualification provisions, and a change in post or job description that brings an existing employee within the scope of the provisions must also trigger a declaration.
- The Single Central Register report includes an additional field for childcare disqualification declarations. The field needs to be completed for all staff, with 'not applicable' for those staff not affected. Evidence of a declaration must be kept on the file of each member of staff subject to the check.
- Third party providers of childcare for under 8s on GDST premises (which may include before or after school clubs or activity camps) will be required to confirm that their safeguarding policies and procedures address the childcare disqualification requirements, and that they are not knowingly deploying disqualified staff. New contracts with these providers must include appropriate wording reviewed by the Legal Department at Trust Office.
- Supply staff agencies must confirm that staff they provide to work in a relevant childcare setting have been asked to inform the agency if they think they may be disqualified, and have been informed that they will be committing an offence if they work when disqualified (the check has been incorporated into the Agency Worker Vetting Record).
- If any member of staff or potential member of staff may be disqualified, schools should contact the Legal Department at Trust Office for urgent, confidential advice.
- Where a school is satisfied that a person working in a relevant setting meets one of the disqualification criteria, the school will inform Ofsted.
- Schools must ensure that no sensitive personal information, including details of cautions or convictions, is stored without the individual's consent, and that any information that needs to be retained is stored securely, for no longer than necessary, and access is limited on a strictly need to know basis. In the event of doubt, advice should be sought from the Legal Department.

What should schools do if an individual does not have a driving licence or passport for photo identification?

There are new guidelines on the identity check procedure (effective May 2012) available at http://www.homeoffice.gov.uk/publications/agencies-public-bodies/dbs/dbs-checking-service-guidance/identity-checking-guidelines and schools should follow these carefully. If an individual does not have a 'group 1' identity document further checks will be necessary. Should schools need to do an external ID validation check via Route Two, they should contact the HR Coordinator at Trust Office. The GDST is registered centrally with an appropriate external organisation to provide validation checks, and a member of the HR team will be able to undertake the external ID check on behalf of schools.

Do checks on the central register ever need to be updated (e.g. for internal promotion)?

- Address: checking the member of staff's address is a pre-employment check, and the record of the check on the central register should not be updated if a member of staff subsequently changes

[41] ISI Commentary September 2019 para 247

[42] ISI Commentary September 2019 para 414 – ISI suggests that 'as an indication only, annually is sensible'

address. Schools will of course need to have a record of the current address for a member of staff on file but this need not be entered on the register.

- Staff stepping up in post may require a new DBS check (see below), proof of additional qualifications, further references, a new medical declaration and a Prohibition from Management check
- Existing volunteers working in school on an irregular or supervised basis moving to a role involving regular unsupervised contact with children should be DBS checked (including a Barred List check)
- Any member of staff giving cause for concern about their suitability to work with children may be checked or rechecked

In all cases where checks are updated, information recorded on the Central Register must be **in addition to** rather than in replacement of the original information. **Original dates for checks must not be overwritten. It is no longer always necessary to obtain a new DBS disclosure for a member of staff who changes role in a school**. This is because when the updating service was brought in, the DBS changed the relevancy test which they use for releasing non-conviction information about an individual. A DBS disclosure now includes all information relevant to the workforce to which the DBS check is related (e.g. child workforce, adult workforce, both or other). Previously, to balance the demands of other legislation, only information relevant to a single position or role would have been released. If the DBS check for a member of staff was completed since the introduction of the update service in June 2013 they will have been submitted to the wider relevancy test and will not need a new check if stepping up in post. If their DBS check is dated before June 2013 a new DBS check should be made.

What can I do about historical gaps on the SCR?

- Refer to the grids in Appendix B7 for details of the checks required for different categories of staff, depending on their date of appointment
- **For any member of staff appointed since 1st May 2007, all checks must be completed and evidence filed, otherwise the school will be judged non-compliant.**
- Should schools discover historical instances of omitted checks which were **legally required** at the time of appointment, in order for the school to be judged compliant the school must be able to demonstrate that issues were identified outside of the inspection process, and that appropriate efforts have been made to fill gaps so far as possible. This may include, for example, seeking references from more recent sources where former colleagues may not be contactable. For staff with no other evidence of medical fitness, a simple medical fitness declaration should be obtained, e.g. 'I know of no reasons, on grounds of mental or physical health, why I should not be able to discharge the responsibilities required by my post' (schools should **not** ask staff to undergo a medical retrospectively).
- It is not necessary to fill gaps in relation to checks which were not obligatory at the time of the person's appointment.
- It is not necessary to apply for DBS disclosures for existing staff **not previously eligible** for DBS (including those recruited before the establishment of CRB/DBS checks) or to apply for a fresh DBS disclosure unless there are concerns about suitability or a member of staff moves to a post that involves greater responsibility for or contact with children. **However if it is found that a member of school staff has been working without the DBS clearance required at the time of appointment having been carried out, an application for a DBS disclosure must be submitted immediately and the member of staff must be checked against the Barred List (see above) and supervised until the DBS disclosure is obtained**

What evidence of appointment checks should be retained?

It is Trust policy that **individual records of evidence (i.e. scans or photocopies of original documents) must be kept for the following checks:**

- Identity (see below)
- Children's Barred List (where made separately in advance of a full DBS check)
- Prohibition from teaching
- Prohibition from management of independent schools (if relevant)

- Nursing and Midwifery Council register (for school nurses only)
- Childcare disqualification (form CDD)
- Qualifications
- Right to work in the UK (see below)
- Overseas check including check on any EEA teacher sanction or restriction (where applicable)
- References
- Employment history (application form)
- Medical fitness (Form S4 or declaration)

Each piece of evidence must be checked and annotated, i.e. dated, with a note as to who carried out the check.

Schools do not have to keep copies of DBS certificates[43], but if they do, they must not be kept for longer than six months. As evidence of this check, schools must note the DBS reference number, level of disclosure, date of disclosure and name of checker. Evidence of an Update Service 'status check' in the form of a print off may be retained and must be handled and kept confidentially following the DBS Code of Practice. (see above).

Evidence of identity check: up to April 2014, it was Trust Policy **not** to keep copies of proof of identity provided for the purpose of appointment checks. From April 2014 *Keeping Children Safe in Education*[44] has required evidence to be kept of the identity check– copies of documents used to verify the identity of staff from April 2014 must be kept on the personnel file as for other evidence detailed above. Copies of identity check evidence for volunteers do not need to be kept. There is no requirement to produce identity check evidence for staff appointed before April 2014 retrospectively – if inspectors raise this please contact Trust Office.

UK Visas and Immigration requires that evidence of **right to work in the UK** must be kept securely for the duration of the individual's employment and for a further two years after they leave employment. The evidence must include photocopies of either the original documents submitted or a copy of the online check (see above). It is important that the date is written on the document copy following the formula: '**the date on which the right to work check was made [insert date]**'. The GDST may be liable for a civil penalty if the date when the check was performed is not recorded.

The school should also retain any evidence needed to comply with the school's obligations under Tier 2 of the Points Based System in relation to non EEA nationals. For further information –see https://www.gov.uk/check-job-applicant-right-to-work and https://www.gov.uk/uk-visa-sponsorship-employers and https://www.gov.uk/government/publications/draft-codes-of-practice-on-preventing-illegal-working

If the individual's documents demonstrate that the person is entitled to work in the UK only for a limited period, a follow-up check must be done shortly before the permission to work or notice expiresto ensure that the employee can still work legally in the UK. These checks should be continued until either the employee can demonstrate an ongoing right to work or stops working for the school. Full details of acceptable documents, and the required frequency of follow-up checks are available in the Employer's Guide https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/773780/An_employer_s_guide_to_right_to_work_checks_-_January_2019.pdf

How should documentation be stored?

Staff files should be held in a locked cabinet with restricted access to keys. Medical records should be kept separately and only be accessible by the Head.

[43] *Keeping Children Safe in Education 2019* para 155 and ISI Commentary September 2019 para 367
[44] *Keeping Children Safe in Education 2019* para 155

Digitised records are acceptable as long as a complete staff file is digitised - a mixture of paper and electronic records is not acceptable[45]. It is still important that electronic records are annotated - i.e. initialled and date stamped (and with the prescribed formula for right to work checks). For the purpose of inspection, personnel files must contain recruitment information as defined in KCSIE. They can contain other information pertinent to the individual but there is no requirement for this.

For the purposes of inspection, it is helpful to keep all documents relating to appointment checks separately and easily accessible on an individual's file. A frontsheet (a sample Central Register Checklist for files is available in the Central Register Documentation folder in the Safeguarding section of the GDST staff intranet) helps to ensure and demonstrate that documentation is complete.

How long should staff files be kept?
In most cases, staff files should be kept for six years after a member of staff leaves, in case any legal process requires them. However, if the file contains a record of any safeguarding concerns, the file should be kept until the person has reached normal pension age or for a period of 35 years from the date of the allegation if that is longer. **No records of safeguarding concerns should be destroyed before the conclusion of the Independent Inquiry into Child Sexual Abuse, led by Professor Alexis Jay, which began in July 2015 and is expected to continue until 2020.** A summary staff record (i.e. period of employment and other basic information, including details of unpaid absences, pension related information, and records relating to an accident or injury at work) should be kept until the member of staff is 72. As a precaution, it is recommended that a SIMS central register report is run annually and a copy archived.

As noted above, UK Visas and Immigrationrequires that evidence of the right to work in the UK must be kept securely for the duration of the individual's employment and for a further two years after they leave employment.

Specific categories of staff, workers and volunteers

Staff who are permanently employed
Schools should complete all the required recruitment checks as detailed in this section. For further information refer to GDST Guidance on Recruitment and Selection on the GDST staff intranet.

Staff transferring between Trust schools or between a school and Trust Office
Since the GDST is one employer, certain checks do not need to be repeated if an employee transfers from one Trust school to another, or between a school and Trust Office as long as there is no break in service. This includes self employed individuals who are engaged by the GDST on the behalf of the school. However it does **not** apply to the Academies as the GDST Academy Trust is a separate employer. If a transfer takes place the employment file of the member of staff should be sent securely to the new school or Trust Office, including all evidence of pre-employment checks. Dates on the school's SCR can also be transferred to the new school, but a note should be added to explain those dates which will therefore appear out of line with the start date at the new school.

Additional checks (e.g. prohibition from management, childcare disqualification) may of course be needed if the member of staff is moving to a new post requiring employment checks which were not relevant to their previous position. As part of the internal appointment process, schools should review the required checks to see what needs to be done. This might be particularly applicable for staff taking on greater responsibilities or for Trust Office staff transferring to a school.

[45] However it is acceptable for some complete staff files to be in paper format and others in digital format

Checks that may be transferred	Checks that should be redone
DBS (including barred list check)[46] Prohibition from teaching Prohibition from management Right to work in the UK Qualifications Previous employment history Medical declaration/form[47] Childcare disqualification	Identity References

Workers on casual or zero hours contracts

If there is a break of less than three months between periods of work, a new barred list check will be required when work is re-commenced. Where the gap is longer than three months, an enhanced DBS check will be required. Schools may wish to suggest the worker subscribe to the DBS Update Service if it is envisaged that periods of time between work assignments will regularly exceed three months. The GDST reimburses workers on casual and zero hours contracts for the annual DBS service update fee. The continuing value of other checks the school has made previously can be risk assessed (e.g. ID is unlikely to to have changed, medical fitness for the role might have). References could be refreshed again after a break (three months again as an unofficial rule of thumb) e.g. colleagues who have worked with the returner could be asked to confirm by email whether they have concerns about suitability.

Volunteers

- Volunteers working in the school **regularly** (for the definition of regular see above) **and unsupervised** are in regulated activity and **must** obtain an enhanced DBS disclosure including a Barred List check.
- There are circumstances in which schools may obtain an enhanced disclosure (without a Barred List check) for volunteers **who are supervised** (and therefore not in regulated activity) even though this is not legally required. It is up to the school to make the decision, based on a risk assessment[48], whether to obtain the disclosure or not, and whether any alternative or further checks would be advisable. From 3 September 2018 details of this risk assessment should be recorded (a pro forma is available in the Central Register Documentation folder in the Safeguarding section of the GDST staff intranet). A risk assessment is **not** required for a volunteer in regulated activity, who will be checked as above as a matter of course.
- Supervision must be by a person in 'regulated activity'[49], on a regular and day to day basis, and 'reasonable in all the circumstances to ensure the protection of children'. The statutory guidance on 'supervision of activity with children which is regulated activity when unsupervised' can found at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/280881/supervision_of_activity_with_children_which_is_regulated_activity_when_unsupervised.pdf
  Further advice is available from HR and Legal departments
- A volunteer who has not obtained an enhanced DBS disclosure with Barred List check **must not** be left unsupervised with children
- It will be for schools to judge whether the required level of supervision will always be in place. Where there is any doubt, **GDST guidance is to err on the side of caution and ensure that an enhanced DBS with Barred List check is carried out.**Where checks are not carried out, schools will need to be able to demonstrate how they have assessed the level of supervision provided and will ensure that the proper level of supervision is always available. DBS checks and registration with the Update Service are free for volunteers

[46] Unless the post involves an additional level of contact with pupils and the previous DBS is dated before June 2013
[47] Unless there is a significant difference to the requirements of the role in which case a new medical declaration should be sought
[48] For further detail on the risk assessment see *Keeping Children Safe in Education* 2019 para 170
[49] As a rule of thumb, this will be a school employee

- Regular and unsupervised volunteers joining the school since May 2007 should also have two references and an informal interview[50] (forms are available in the Central Register Documentation folder in the Safeguarding section of the GDST staff intranet). A note on file that no concerns have been raised by others in the school community should also be made.
- Volunteers who are subject to checks should complete the Safeguarding Information Form for Volunteers (also available in the Central Register Documentation folder in the Safeguarding section of the GDST staff intranet) and be entered on the central register. Schools should expect to be able to justify the level of check that has been undertaken. Volunteers who are not subject to checks do not need to be checked or entered on the SCR.
- Schools do not need to DBS check existing regular and unsupervised volunteers continuing with previous duties, unless they have cause for concern or the volunteer changes duties to include increased contact with children. In such cases schools are recommended to record N/A on the register and put a note on the file giving the reasons for the check not being considered necessary

Schools should also:

- Familiarise volunteers with key aspects of the school's Safeguarding and Child Protection Policy as part of their induction
- Issue guidelines on how to deal with the disclosure or discovery of abuse (e.g. advice on communicating with children about their concerns, and the Record of Safeguarding Concern Form)
- Provide adequate support and training (as appropriate)

Self employed individuals

Since January 2014 new self employed individuals have been required to subscribe to the DBS Update Service, and for those who were already engaged in existing roles, with effect from September 2014, agreements and contracts must have been re-negotiated to include the condition for subscribing and giving consent for an annual check to be made. Schools must therefore undertake annual DBS status checks on all such individuals; it is thought that the summer holiday period is the opportune time to do so, in advance of appointments re-commencing in September. There is no requirement to do the annual check on a rolling basis, but schools may do so if they prefer. The cost of the annual DBS subscription fee for self-employed individuals will not be reimbursed.

Trainee Teachers

Initial Teacher Training ('ITT') providers are required to ensure that all entrants to ITT have been subject to a DBS and/or any other appropriate background checks. ITT providers take full account of information contained in DBS disclosures when recruiting trainee teachers and will not offer places to those with any convictions that suggest they might pose a risk to children and young people. Schools should not ask to see the DBS disclosure of trainees but should seek written confirmation from the ITT provider that **all** appropriate checks - including an enhanced DBS with Children's Barred List check, prohibition from teaching check and overseas checks (where relevant) - have been carried out, and that such checks do not disclose any matters of concern. If applicable the provider should also confirm that the trainee has been screened in respect of Childcare Disqualification Regulations. This written confirmation should be retained on file – schools are not required to obtain or record the DBS certificate number or date of issue. The school must however carry out its own identity check on arrival. ITT trainees do not need to be entered on the SCR If they are the notes field should be used to record that the school has confirmation of the checks.

The situation is different for trainees on an employment based teacher training route. They are employed by the school and should therefore be subject to the full range of safeguarding employment checks by the school, these being recorded on the central register in the same way as other directly employed staff.

School Nurses

[50] This is a GDST recommendation not a requirement. The need for additional checks may be determined by the school on the basis of an informal risk assessment in relation to the person, the work, the vulnerability of the children and the situation (ISI Commentary September 2019 para 457)

Every practising nurse has to be registered with the Nursing and Midwifery Council (NMC). Registered nurses are issued with a pin number. Newly appointed school nurses should be checked against the register to establish a) if they are on the register and b) that there are no restrictions to them practising nursing. To check the NMC register visit the NMC website at https://www.nmc.org.uk/registration/search-the-register/ and enter the nurse's pin number. It will display the person's minimum details (their name, whether they are active on the register and whether there are restrictions against their pin which might prevent them from practising). The nurse's pin number and the date of the check should then be recorded on the SCR in the notes field and a screen print of the result kept on file. An annual re-check of NMC registration for existing nurses is completed by the HR Coordinator at Trust Office and evidence of individual checks is retained.

Host Families

Keeping Children Safe in Education Annex E contains specific advice on safeguarding arrangements in relation to school exchange visits. This has been updated for September 2018. In circumstances where a school arranges for a visiting child to be provided with care and accommodation in the UK (including where a company is engaged to make these arrangements) in the home of a family to which the child is not related, the responsible adults will be in regulated activity for the period of the stay and therefore a DBS enhanced certificate with barred list information should be obtained for each individual in regulated activity. As long as the hosting arrangement is unpaid, the check should be free of charge. Schools are free to decide whether it is necessary to obtain further DBS enhanced certificates for anyone over 16 in the household other than those in regulated activity.

Where children of one school (A) in the UK are hosted in homestays arranged by another (B) in the UK, school B would be the regulated activity provider with responsibility for vetting checks.

Schools will not be able to obtain checks on host families abroad as the DBS system does not exist outside the UK. Instead schools should work with partner schools or the organising company to establish a shared understanding of the arrangements in place, in order to ensure that these are appropriate and sufficient to safeguard pupils on the trip.

In addition to formal vetting checks, it is expected that exchange arrangements will involve other measures to safeguard UK or overseas pupils participating, documented in the risk assessment. This may include pupils being seen by a member of staff every day while away from home, having access to a mobile phone with signal and knowing who to contact and how if they have any concerns about their own safety, and providing parents and pupils with information about risks and protective measures in place in advance of the trip.

Schools should notify the LA of UK homestays for children under 16 (or under 18 if the child has disabilities) which last 28 days or more, as this may constitute private fostering under the Children Act 1989.

Guardians for boarding or overseas pupils

If a school makes arrangements for finding a guardian for an overseas pupil, it takes on the full welfare responsibility for the arrangements it makes. All adult members of the host family (i.e. over 16) should undergo the same recruitment checks as staff. A nominated member of staff should monitor arrangements regularly (regulations regarding lodgings also apply – see ISI Handbook January 2017 notes under NMS 14.1, 14.5, 14.6 and 20).

School Governing Boards

Members of School Governing Boards are required by the Trust to have an enhanced disclosure and prohibition from management check. Legislative changes introduced by the Protection of Freedoms Act 2012 mean that disclosure applications for board members acting **solely in their capacity as governors** should not include a barred list check. **However**, the GDST advises that in most circumstances a barred list check **should be requested** within the DBS application, on the basis that given their role governing board members are likely to come into regular and unsupervised contact with children.

SGB members are not members of a proprietor body so do not require a right to work in the UK check.

Agency /Supply staff

Supply staff could perform any function, not only teaching. Staff directly employed by the school to provide supply cover must be treated as school staff.

Schools must:

- Include agency staff on the SCR from their first day of work, irrespective of how long they work at the school (however agency staff used occasionally do not have to be taken off the SCR and then re-entered at a later date)
- Check the member of staff's identity on arrival, and include this check on the central register
- Check that the agency's contract states that they operate safer recruitment procedures, that they will provide confirmation of all relevant safeguarding checks in relation to each employee supplied to the school, and will provide a copy of the original DBS disclosure. Such contracts will be subject to review as part of school inspection.
- Before the individual starts work, obtain written confirmation from the employer/supply agency detailing all the recruitment checks carried out, and retain this confirmation on file. The template Agency Worker Vetting Record Form (which is available in the Safeguarding section of the GDST staff intranet) can be used to confirm that all appropriate checks have been completed.
- Checks should include an enhanced DBS disclosure, which should be dated **within the last 3 months** unless the 'three month rule' applies (i.e. that the agency worker has moved from one placement to the next within the school workforce without a break in employment of three months or more). Note that a teacher working for a supply agency should have a fresh DBS check every 3 years (or earlier if there are grounds for concern or a break in service of 3 months or more). **The school must receive a copy of the of the DBS certificate from the agency.**
- Ensure that the Head or a directly delegated member of staff has assesse**d that the member of sta**ff is suitable for the work for which they have been supplied
- Require that such staff receive a copy of the school's safeguarding policy and relevant procedures
- Require the staff to sign the Agreement (see Appendix B4) to confirm that they will work in accordance with the school's policy and procedures and retain a copy on file
- Provide these staff with relevant training in relation to safeguarding and keep a record of such training
- **For all agency staff the central register must contain entries** for post and date of appointment, the date of written notification from the supply agency for the following recruitment checks: identity, enhanced DBS with Barred List check (with the DBS number and date of issue), overseas (and EEA) check, and prohibition from teaching and prohibition from management checks (where relevant), disqualification from childcare (if appropriate), right to work in the UK, references, declaration of medical fitness, qualifications (where relevant) and previous employment history. The school must also record whether the agency has supplied a copy of the DBS certificate, the date of sight of a copy of the certificate and[51] show that the school has carried out its own identity check[52].
- In the case of boarding schools, the **date of each check by the agency** on staff who will care for, train, supervise or be in charge of boarders must be recorded on the SCR

Employees of contractors

- The **organisation** carries out the safeguarding checks on its employees – the extent of these checks varies depending on the level of contact with children – the school decides what is appropriate. However long term contract employees should be checked as for school staff.
- Checks will include an identity check - DBS will be at enhanced **or** standard level – barred list check only for those in regulated activity – further checks may be required (determined as above)

[51] ISI Commentary September 2019 para 418

[52] ISI Commentary September 2019 para 444

- The school must obtain confirmation that the checks have been carried out. The DfE has advised that this should contain details of names of specific individual employees, checks and dates: an un-particularised assertion that 'we check all staff' is not sufficient[53]
- The school is not required to undertake its own DBS certificate check – however identity must be checked on arrival
- Employees of contractors are not required to be entered on the SCR unless the school chooses to do so
- Where an individual runs their own business and is also the person providing the service, it is not reasonable or advisable to accept their own assurance that they have carried out checks on themselves. In such circumstances the school should carry out the required checks, and enter this information on the SCR. The cost of the DBS check should be charged to the organisation.
- Occasional contractors without checks must be supervised at a level determined by the school
- It is good practice (but not a direct regulatory requirement) for the staff of contractors working regularly in school with opportunity for contact with pupils to have basic safeguarding training at a level appropriate to their role (e.g. the identity of the DSL, the duty to pass on concerns, appropriate behavioural boundaries)

Transfer of employees under TUPE

If there is continuous employment under TUPE arrangements, there is a requirement for information to be passed on to the new owner. If the details are fully in order, the new employer enters them on its own central register, including the number and date of the DBS checks, and adds a note to the register that the details have been accepted under TUPE arrangements. There must have been no three-month break in employment. However, if the information is incomplete, it is necessary to undertake a new DBS check and to include the other necessary checks.

GDST engaged Consultants/Contractors: Where Consultants/Contractors (and contractor's staff) are employed under a GDST Framework Agreement/Consultant Appointment or construction Contract, the terms and conditions provide that all staff who may come onto a GDST site ("Relevant Staff") must have appropriate checks (including identity and enhanced DBS – but without a Barred List check) carried out within the last 12 months, and written confirmation must be given whether any disclosures were revealed by those checks. Schools should keep records of confirmations from the contractor, to be checked on inspection as part of the school having regard to safeguarding guidance. Where the DBS check does reveal information (e.g. cautions, convictions, comments), this must be made known to the GDST who will request the details for review. If details are not forthcoming or the nature of the disclosure is of concern, then the GDST has discretion to determine whether that individual may be permitted to work on the project.

It is not a requirement for these staff to be entered on the central register, however, the school should keep records of the confirmations from the contractor, to be checked on inspection as part of the school having regard to safeguarding guidance. Photographic identity should be checked on arrival at the school.

The Consultant/Contractor will be provided with a tailored GDST Safeguarding Leaflet (see appendix B9), and is required under the terms of the agreement to provide this to Relevant Staff.

Consultants, contractors and their staff must only access parts of the school site specifically designated for a particular project, and must sign in and out of the site.

Each GDST Framework Agreement/Consultant Appointment or construction Contract will contain the names of two 'School Liaisons'. Any individual needing to access any part of the site which has not been designated for a project, must report to one of the named School Liaisons, so that appropriate working arrangements can be agreed **before** accessing any other part of the school site.

Before/After school care

[53] ISI Commentary September 2019 para 472

Where the school provides such services or activities directly under the supervision or management of school staff, all requirements (such as vetting checks and record keeping) are the same as for school staff.

Where a third party is responsible for running the services, there should be clear lines of accountability and written agreements setting out responsibility for carrying out the recruitment and vetting checks on staff and volunteers, which should include all standard safer recruitment checks including identity and enhanced DBS checks. The agreement should also set out responsibility for health and safety. Schools should only work with providers who can demonstrate that they have effective procedures, training and vetting arrangements for their staff, appropriate child/adult ratios and contingency arrangements for the unexpected.

Clubs

- If clubs are run by the school, employees should be on the central register and subject to all the same checks as per teaching staff
- If clubs are run for school pupils by external providers, the staff should be treated as contract staff (as above). They will be subject to all the same checks as for teaching staff in regulated activity, but it is the responsibility of the employer (club provider) to make these checks unless they both run the club and provide the service themselves.
- Where the school premises are used for external clubs, summer school activities etc. which are open to the general public, the school has no legal obligation for safeguarding checks on these external employees. **However,** depending on the nature and circumstances of the letting, it is possible that the school could be perceived as having endorsed the activity or provider in question, especially where, for example, it is advertised at school and consists mainly of school pupils (an example of this would be **clubs run by the school's PTA** for the school community, rather than just for school pupils), putting the school at risk of reputational damage should problems arise. For this reason, the GDST Hire Agreement includes a requirement for staff or volunteers working for the provider to have received an appropriate DBS clearance. In some circumstances (e.g. many pupils being involved, an overnight stay etc.), the school may judge it appropriate to take extra steps, for instance to obtain written evidence that all safer recruitment checks (including Enhanced DBS checks) have been carried out, and a copy of such confirmation retained on file as per with agency staff.
- There are additional considerations for community and club use of school sports facilities. Schools should refer to p.4 of the NSPCC guidance. The Hire Agreement incorporates a number of the NSPCC's recommendations.

Off site providers (directly employed by the school or by an external organisation)

The school must ensure that off site individuals(i.e. those who come into contact with pupils but do not work at the school – e.g. DofE providers, rowing coaches, riding school instructors etc.) are suitably checked. Off site staff employed directly by the school must be checked by the school and entered on the SCR. For individuals employed by an umbrella body, the school must obtain written confirmation from the employer that it has carried out suitable checks (listing those checks) on relevant employees. Prohibition orders prohibit those subject to them from carrying out teaching work in schools, children's homes and sixth form colleges, so off site workers do not strictly require this check. Employees of other organisations do not have to be entered on the SCR (although the school may choose to do so).

Individuals not in regulated activity

Some individuals, such as artists in residence and sports coaches, may come onto the school site on an infrequent basis and therefore do not meet the definition of regulated activity. Where they are supervised by suitably checked school staff, the full range of checks is not required although schools will be expected to have in place suitable supervision arrangements which are fully documented, agreed with the individuals concerned, and are regularly reviewed. The school may decide what checks to undertake to be assured of the suitability and competence of the individual (i.e. references or qualifications), and should always check identity on arrival.

Drivers
Minibus drivers employed directly by the school should be checked as for other school employees. Schools should require confirmation from bus/coach companies who supply drivers for the school run or school trips that they have carried out the child protection checks required for contract staff, including obtaining an enhanced DBS disclosure and Children's Barred List check. Similarly, taxi drivers used frequently or regularly by the school who are alone with pupils are in regulated activity and should be fully checked.

In some cases buses/coaches are arranged by parents, with no involvement from the school. In such cases, whilst the school/GDST are not directly arranging the coaches, there is a link to the school from a publicity point of view, and this could be crucial if a company was found to be transporting pupils with drivers who had not been properly checked. It is therefore recommended that in relevant circumstances schools make parents aware of the GDST guidelines on hiring coaches or taxis (available on the GDST staff intranet), and encourage them to follow these.

Parental lifts arranged independently of the school are personal arrangements outside the scope of the legislation. However if a parent provides frequent or regular unsupervised lifts which are arranged by the school, this is regulated activity and the parent would need to be checked and entered on the SCR.

Visiting Speakers
Speakers who visit the school on an occasional basis and are supervised will not be eligible for Barred List checks and may not be eligible for DBS checks. However such visitors may fall within the scope of the *Prevent* duty and schools are expected to have a protocol for the vetting, invitation and supervision of any visiting speakers. Guidance on producing a protocol can be found in Appendix B12. In brief, schools should have procedures to ensure that any visiting speaker engaged by pupils or staff to speak at the school, whether this is a part of the school programme or an external event, is suitable (via for example a reference or recommendation from a trusted source, an internet search or other relevant means), and appropriately supervised during the visit.
Supervised speakers who visit on a one-off basis or occasionally do not need to be entered on the SCR. In other cases ISI advises that schools should exercise discretion and decide on a case by case basis which formal checks are required and must be recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment (if any), and whether speakers are employed by another organisation. Inspectors will be looking to see whether schools have thought through their chosen approach and are implementing their protocol rigorously.

ISI Inspectors
For the purpose of DBS checks, inspectors should be regarded as visitors according to the school's policies, for example they may be asked to register on arrival and wear a visitor's badge. As a registered body, ISI ensures that checks are carried out on all its inspectors.

Gap year staff
Gap year staff must be DBS checked. It is possible for a school to submit a DBS disclosure form while the applicant is still overseas. The registered body needs assurances of the applicant's identity from the student's overseas school. It is advisable to start the process well in advance of starting work. In this way staff are able to have checks complete before they take up their duties. Schools should also ask for a reference, including a request for any reason why the gap member of staff should not be employed to work with children and details of any concerns regarding working with children.

Work Experience
Schools and colleges are not able to request an enhanced DBS check with barred list information for staff supervising children aged 16-17 on work experience. However, barred list checks by the DBS might be required on some staff who supervise a child under 16 on a work experience placement, and schools should refer to *Keeping Children Safe in Education 2019* paras 186-190 and the GDST guidance on Work Experience for more detailed guidance. The duty for undertaking the checks rest with the work experience provider rather than with the school.

Pupils participating in work experience should be given clear advice about who to contact if they are worried about their surroundings or if they suffer abuse. Additional advice and guidance about identifying and responding appropriately to situations that may give rise to concern in the workplace may be appropriate, as this will be a very different environment to their familiar school community. Pupils should also have a named contact person from school whom they can contact and be given opportunities to raise any concerns they might have.
If a student over 16 undertakes work experience in a 'specified place' such as a school or nursery, she may need to be DBS checked (depending on the nature and frequency of the work undertaken, it may constitute 'regulated activity').
Similarly, schools should consider whether students or adults from other establishments undertaking work experience in their setting should be subject to safeguarding checks.

Family members and resident guests of resident staff members
Enhanced DBS checks must be carried out on all persons living on the school site, including all family members over the age of 16, and any resident guests. There is no requirement to include such persons on the central register (although schools may do so). It would be reasonable for evidence of the checks to be kept in a paper file along with other relevant documentation. For boarding schools, there must be a written agreement between the school and any person over 16 not employed by the school but living in the same premises as boarders (for example, members of staff households). This specifies the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have contact with children. They must be required to notify an unrelated designated senior member of staff if they are charged with, or convicted of, any offence (NMS 14.3).

B6. Allegations of abuse made against teachers and other staff

This section of the guidance reproduces Part 4 of Keeping Children Safe in Education

Duties as an employer and an employee

195. This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school or college that provides education for children under 18 years of age 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; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

196. This part of the guidance relates to members of staff who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

197. Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Initial considerations

198. The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

199. Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The designated officer(s) should be informed of all allegations that come to a school or college's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

200. The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated**: there is insufficient evidence to either to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

201. The headteacher or principal, or (where the headteacher or principal is the subject of an allegation) the chair of governors, or the chair of the management committee or proprietor of an independent school (the 'case manager') should discuss the allegation immediately with the designated officer(s). The purpose of an initial discussion is for the designated officer(s) and the case manager to consider the nature, content and context of the allegation and agree a course of action. The designated officer(s) may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the designated officer(s) in order to help determine whether police involvement is necessary.

202. The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the designated officer(s) what action should follow both in respect of the individual and those who made the initial allegation.

203. The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s). It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step (see further information on suspension which follows).

204. If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance *Working Together to Safeguard Children*. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

205. Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer(s) should discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

206. In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the designated officer(s) should discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school or college's staff.

207. However, in other circumstances, such as lack of appropriate resource within the school or college, or the nature or complexity of the allegation will require an independent investigator. Many local authorities already provide for an independent investigation of allegations, often as part of the personnel services that maintained schools and colleges can buy in from the authority. It is important that local authorities ensure

that schools and colleges have access to an affordable facility for independent investigation where that is appropriate.

Supporting those involved

208. Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

209. The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. For staff in maintained schools and colleges, that may include support via the local authority occupational health or employee welfare arrangements. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

210. Parents or carers of a child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.[54]

211. Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraph 206-7). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

212. In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

Confidentiality

213. It is extremely important that when an allegation is made, the school or college makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State[55] or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by

[54] In deciding what information to disclose, careful consideration should be given to the provisions of the Data Protection Act 1998, the law of confidence and, where relevant, the Human Rights Act 1998.

[55] Carried out by the Teaching Regulation Agency

going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

214. The legislation imposing restrictions makes clear that "publication" of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

215. In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted).

216. The case manager should take advice from the designated officer(s), police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

Managing the situation and exit arrangements

Resignations and 'settlement agreements'

217. If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. **A referral to the DBS *must* be made, if the criteria are met[56].** Schools and sixth form colleges must also consider whether a referral to the Secretary of State is appropriate[57]. If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school or college from making a DBS referral even though the criteria are met, is likely to result in a criminal offence being committed. This is because the school or college would not be complying with its legal duty to make the referral.

218. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

219. 'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation

[56] See Paras 163-164 of *Keeping Children Safe in Education 2019*
[57] See Para 166 of *Keeping Children Safe in Education* 2019

before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Record keeping

220. Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

221. The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

222. Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

223. The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention.[58]

References

224. Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.[59]

Timescales

225. It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are shown below: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

226. For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the designated officer(s). In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

[58] Information Commissioners Office – Guidance on employment records in its Employment Practices Code and supplementary guidance

[59] See paras 144-147 of *Keeping Children Safe in Education 2019* for further information on references.

Oversight and monitoring

227. The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with the three safeguarding partners. The designated officer(s)will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

228. Police forces should also identify officers who will be responsible for:

- liaising with the designated officer(s);
- taking part in the strategy discussion or initial evaluation;
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

229. If the strategy discussion or initial assessment decides that a police investigation is required, the police should also set a target date for reviewing the progress of the investigation and consulting the Crown Prosecution Service (CPS) about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Suspension

230. The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic response when an allegation is reported; all options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the designated officer(s), children's social care or the police as required. But suspension is highly unlikely to be justified on the basis of such concerns alone.

231. Suspension should be considered only in a case where there is cause to suspect a child or other children at the school or college is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the designated officer(s). In cases where the school or sixth form college is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the school or sixth form college, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work.

232. The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the designated officer(s), police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension. Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;

- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or work for the local authority or academy trust.

233. These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

234. If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the designated officer(s). This should also include what alternatives to suspension have been considered and why they were rejected.

235. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

236. Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the proprietor of the school, or governing bodies of the school or college who are the employers of staff at the school or college. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the designated officer(s) should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school or college consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

Information sharing

237. In a strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

238. Where the police are involved, wherever possible the employer should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

239. Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

Specific actions

Following a criminal investigation or a prosecution

240. The police should inform the employer and designated officer(s)immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged. In those circumstances the designated officer(s) should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

On conclusion of a case

241. If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the designated officer(s)should discuss with the case manager and their personnel adviser whether the school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required;[60] and in the case of a member of teaching staff at a school or sixth form college, whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching.

242. **There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child[61].**

243. Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school or college.

In respect of malicious or unsubstantiated allegations

244. If an allegation is determined to be unsubstantiated or malicious, the designated officer(s) should refer the matter to the children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the headteacher, principal or proprietor should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil or student.

Learning lessons

245. At the conclusion of a case in which an allegation *is* substantiated, the designated officer(s) should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school or college's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from

[60] Disclosure and Barring Service – guidance on Referrals to the DBS
[61] See paragraph 163 of *Keeping Children Safe in Education 2019*

the use of suspension when the individual is subsequently reinstated. The designated officer(s) and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

Further information

246. See the College of Policing: Engagement, Communication and Media relations

Appendix B1 - Useful Definitions

CAMHS	Child and adolescent mental health services, which promote the mental health and psychological well-being of children and young people, and provide multi-disciplinary mental health services to all children and young people with mental health problems and disorders to ensure effective assessment, treatment and support, for them and their families.
Child	a person under the age of 18 (s105 Children Act 1989)
Channel	the multi-agency process designed to safeguard vulnerable people from being drawn into extremist behaviour. It works in a similar way to existing safeguarding partnerships.
Child abuse	See *Keeping Children Safe in Education* paras 21-25
Child Protection	This is part of safeguarding and promoting welfare. It is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.
Children in need	under section 17 of the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or this will be significantly impaired without the provision of services, plus those who are disabled. The key factors in determining whether a child is in need are: what will happen to the child's health or development without services being provided; and the likely effect the services will have on the child's standard of health and development. See further Appendix B2.
Designated Safeguarding Lead	This is the individual (or individuals) identified within the school with lead responsibility for child protection and safeguarding matters.
Extremism	Vocal or active opposition to fundamental British values … (including) calls for the death of members of our armed forces, whether in this country or overseas.
Local Safeguarding Partners	The three local safeguarding partners (the local authority, a clinical commissioning group for an area within the local authority, and the chief officer of police for a police area in the local authority area) make arrangements to work together with the appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. They have a shared and equal duty to work together to safeguard and promote the welfare of children. They should make arrangements to allow schools to be fully engaged, involved and included in this process. Detailed guidance on these arrangements can be found in *Working Together to Safeguard Children*.
Prevent	The Prevent duty is the duty under the Counter-Terrorism and Security Act 2015 on (*inter alia*) schools, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.
Radicalisation	The process by which a person comes to support terrorism and forms of extremism.

Safeguarding	This is broader than child protection, and includes the process of protecting children from maltreatment; preventing the impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes
Significant harm	Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 states *"Where the question of whether harm suffered by a child is significant turns on the child's health and development, his health or development shall be compared with that which could reasonably be expected of a similar child".* There are no absolute criteria, but factors will be the severity of the ill treatment, the degree and extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism, and bizarre or unusual elements.
Social Services	The work of local authorities exercising their social services functions with regard to children. This may also be referred to as Children's Social Care or local authority children's social care, or Children's Services (within the local Social Services Department). The LADO will be part of this.
Well-being	For children, well-being is the term used in the Children Act 2004 relating to the five Every Child Matters outcomes, i.e. being healthy; staying safe; enjoying and achieving; making a positive contribution; and achieving economic well-being.

Appendix B2 - Illustrative Indicators of Pupils "In Need" [62]

Model of Assessing Children 'In Need'



Figure 1 – The Assessment Framework[63]

[62] Children Act 1989 Part 3 section 17

[63] Framework for the Assessment of Children In Need and their Families: Department of Health (2000)

Pupils' Developmental Needs

Pupils with low self esteem	Pupils unable to form peer relationships
Pupils experiencing loss (including divorce) or bereavement	Pupils who are withdrawn
Pupils who are in a "caring capacity" i.e. caring for parents who are ill (mentally or physically) or who are disabled	Pupils who experience bullying
Pupils who bully	Pupils who have been abused
Pupils with mental health difficulties	Pupils whose talents attract intense or invasive public interest
Pupils who may be engaged in illegal employment or working hours	Pupils whose exceptional talents demand excessive training/ practice schedules
Pupils who present problems around diet, hygiene or dress	

Parenting Capacity:

Pupils whose parents show no interest/involvement in their education	Pupils living with domestic violence
Parents who condone continued lateness/ non-attendance	Pupils who are over disciplined or over stimulated
Pupils living in inconsistent transient family situations	Pupils whose parents or siblings have mental health problems
Pupils living with high criticism/ low warmth	Pupils whose parents or siblings misuse drugs/alcohol
Parents with overly high/ or unrealistic expectations of their child	

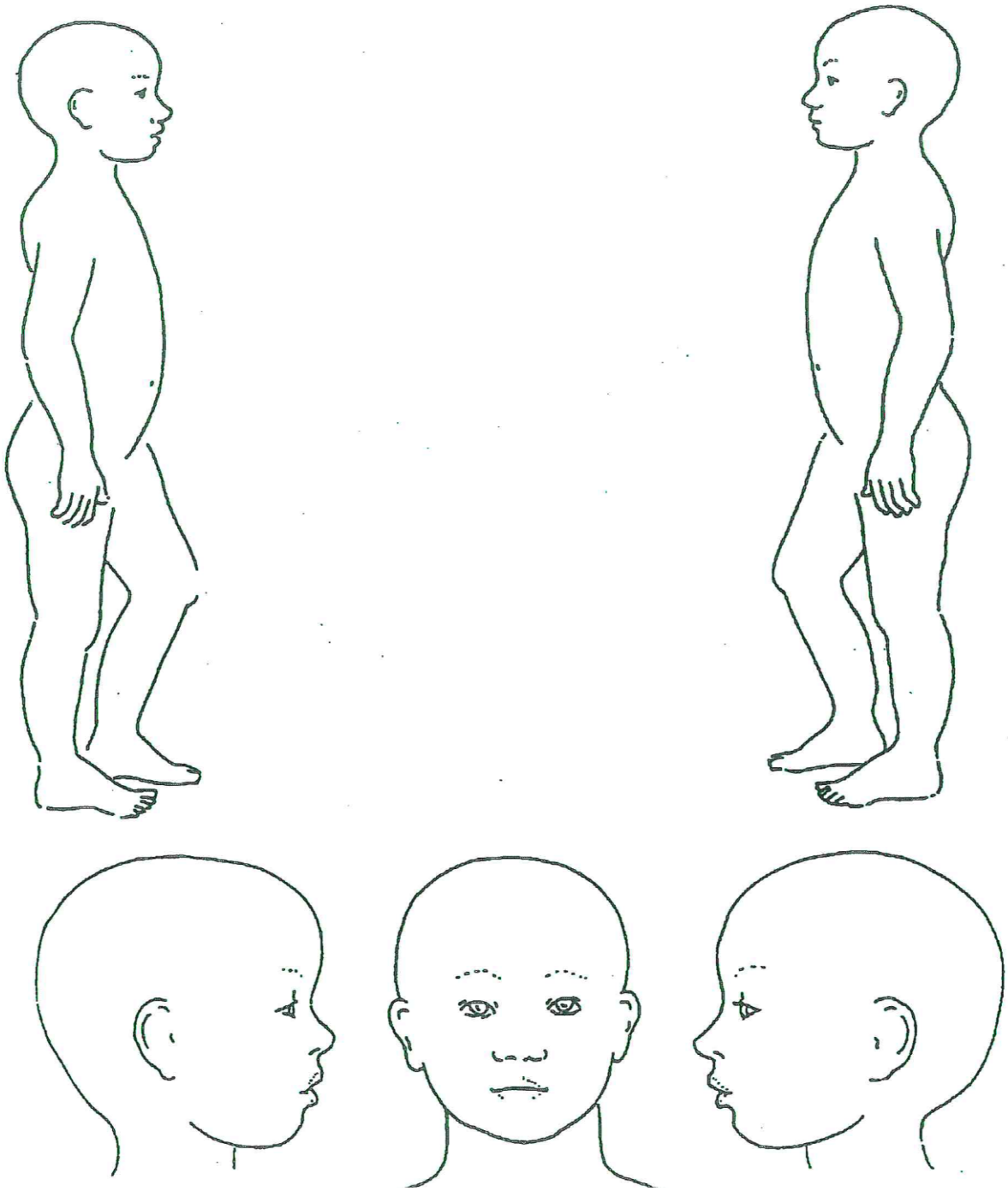
Illustrative Family / Environmental Factors:

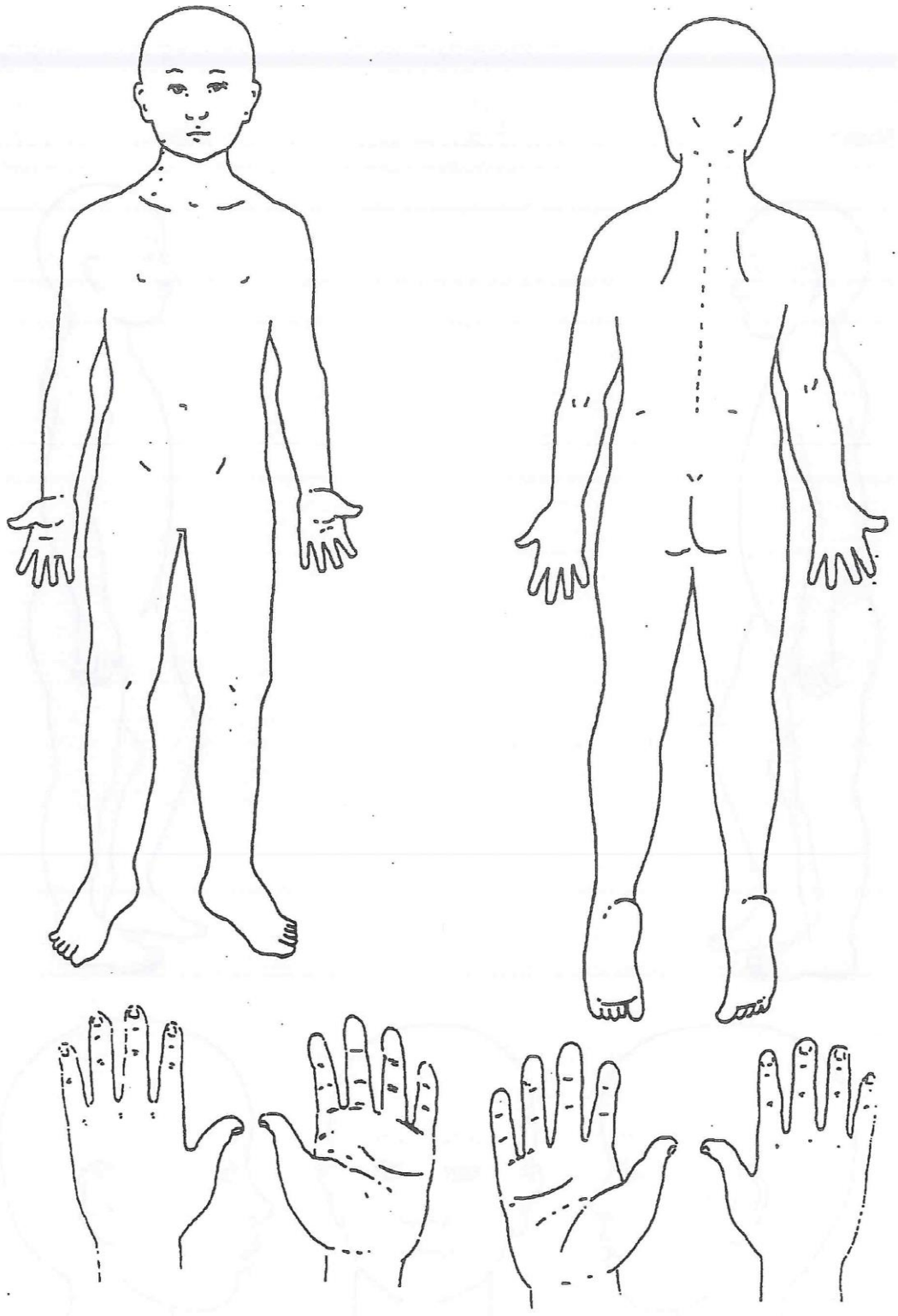
Families living in social/ cultural isolation	Families experiencing sudden or extreme financial hardship
Families who are victims of harassment and or racism	Families who may have members who have a very high public profile eg in Sport, Arts, the media or politics
Families who lack support networks	Families who are members of HM Armed Forces

Appendix B3 - Body Map

SKIN MAPS

Name: ..... DoB: .....





Note position of and describe any bruises, cuts, grazes or marks.
Name of person reporting injury ……
Date & time of recording …….
Signature ……..

Appendix B4a - Agreement to Work in Accordance with GDST Safeguarding and Child Protection Policy and Procedures

The GDST is committed to supporting all staff and volunteers to carry out their roles and responsibilities effectively and to ensure that the highest standards of professional conduct are maintained at all times.

We rely on you to help us safeguard and promote the welfare of the pupils in our care.

No member of staff or volunteer is allowed to develop an intimate or sexual relationship with a pupil under 18 years. This is regarded as an "Abuse of Trust" and is a criminal offence. An intimate or sexual relationship with a pupil of any age is regarded as gross misconduct under the GDST's Disciplinary Procedure.

All staff (including visiting teachers and sport coaches) and volunteers should help the school by reporting concerns they have about misconduct, inappropriate behaviour or abuse by any staff member or volunteer. Concerns must be reported in good faith and must not be malicious.

All staff are also under a duty to alert the school to any changes to their own personal circumstances which may affect their suitability to work with children. This includes informing their line manager of any medical condition, disability or medication that may affect their ability to do their job, and of any charge or summons to appear in court in relation to a criminal offence (other than minor road traffic violations). Staff and others who work with children in the early years or directly manage the setting are expected to disclose any convictions, cautions, court orders, reprimands and warnings they have received which may affect their suitability to work with children (whether received before or during their employment at the setting).

If you have any queries about your role in relation to safeguarding or if you have any ideas that could help to keep pupils safe/ promote their welfare, talk to your line manager or the Designated Safeguarding Lead.

Agreement

I have received, read and understood copies of:

1. School Safeguarding and Child Protection Policy
2. Part 1 and Annex A of *Keeping Children Safe in Education*
3. Safeguarding Procedures Part A 'The Practice of Safeguarding'

The School Designated Safeguarding Lead is …….

S/he can be contacted at …… Or tel. no ……

The Deputy Designated Safeguarding Lead is ……

I agree to work in accordance with the GDST Safeguarding and Child Protection Policy and Procedures, and any future changes to these made in accordance with changes in legislation, statutory guidance and improvements in practice and communicated by the school

Name (print) …….. Signed……

Role…… Date ……

DSL /Line Manager

Signed…….. Date…….

Appendix B4b - Agreement to Work in Accordance with GDST Safeguarding and Child Protection Policy and Procedures (simplified version)

The GDST is committed to the protection of and care for all our pupils. All staff, volunteers and anyone who works regularly with our pupils have a part to play in this.

[staff name] has explained the school's safeguarding policy and procedures, and Part 1 of *Keeping Children Safe in Education* to me.

I know what to do and who to speak to if I have a concern about a pupil or another member of staff.

The School Designated Safeguarding Lead is …….

S/he can be contacted at …… Or tel. no ……

The Deputy Designated Safeguarding Lead is ……

I agree to work in accordance with the GDST Safeguarding and Child Protection Policy and Procedures, and any future changes to these made in accordance with changes in legislation, statutory guidance and improvements in practice and communicated by the school

Name (print) …….. Signed……

Role…… Date ……

DSL /Line Manager

Signed…….. Date…….

Appendix B5 – Guidelines for Sport

The GDST believes that sport should be carried out in a safe, positive and encouraging atmosphere of healthy competition which assists in the promotion of pupils' welfare. Pupils should be encouraged to enjoy sport in an environment which encourages *all* to develop a healthy lifestyle, self confidence, enjoyment and fun, as well as providing opportunities for skill development, sporting excellence and achievement.

The NSPCC's Child Protection in Sport Unit is a key source of advice and guidance for safeguarding in sport. Specifically, its guidance on the key considerations for schools hosting a sporting event should be followed. This includes guidance on:

- schools hosting a sporting event
- visiting other premises for a sporting event
- using external coaches for sporting activities
- using volunteers as coaches
- community and club use of the school sports facilities

Employing Coaches

Sports Coach UK has produced minimum standards for coaches. When looking to employ a coach, even through an agency, schools should take these standards into account to ensure the person is suitable for the role. Schools should employ the same safe recruitment practices they would use with any other member of staff such as face to face interview, identity, qualification and training checks, reference checks and vetting checks if they will be involved in regular or unsupervised contact with children. The school will also need to put into place an induction plan and agree supervision levels and a probationary and review period.

To help promote clear expectations about the behaviour of coaches in schools the GDST endorses and encourages individual schools to ensure that their coaches (staff, outside sport coaches or volunteers) adhere to guidance on best practice from leading organisations, such as the Coaches Charter set out below.

The Coaches Charter

1. Coaches must respect the rights, dignity and worth of every person and treat everyone equally within the context of their sport.
2. Coaches must place the well-being and safety of the performer above the development of performance. They should follow all guidelines laid down by their sport Governing Body and hold appropriate insurance cover.
3. Coaches must develop an appropriate working relationship with performers, especially children, based on mutual trust and respect. Coaches must not exert undue influence to obtain personal benefit or reward.
4. Coaches must encourage and guide performers to accept responsibility for their own behaviour.
5. Coaches should hold up-to-date nationally recognised Governing Body coaching qualifications.
6. Coaches must ensure the activities they direct or advocate are appropriate for the age, maturity, experience and ability of the individual.
7. Coaches should at the outset clarify with performers, and where appropriate their parents, exactly what is expected of them and what performers are entitled to expect from their coach.
8. Coaches should co-operate fully with other specialists (e.g. other coaches, officials, sport scientists, doctors, physiotherapists) in the best interest of the performer.
9. Coaches should always promote the positive aspects of their sport (e.g. fair play) and never condone rule violations or the use of prohibited substances.
10. Coaches must consistently display high standards of behaviour and appearance.

This Charter is reproduced by courtesy of Sports coach UK. For more information on guides for sports coaches visit http://www.sportscoachuk.org/.

Heads of PE should ensure that staff, outside coaches or volunteers, do not:

- Introduce training regimes which by their nature and intensity of training, exceeds the capacity of the pupil's immature and growing body
- Encourage the use of drugs to improve the young person's performance
- Engage in constant criticism, bullying or unrealistic pressure to perform to consistently high expectations

Heads of PE should ensure that staff, outside coaches or volunteers:

- Always liaise with parents/guardians before recommending specific diets and that parents should be encouraged to seek further medical advice before starting a specific diet designed to build stamina, strength or sporting performance
- Consider how they congratulate young performers i.e. in accordance with guidelines on acceptable and unacceptable physical contact

Additional guidelines on Safe Physical Contact in Sport

Heads of PE need to develop an awareness of the views and position of sporting governing bodies with regards to safe physical contact for any sport undertaken in their individual school. Not all sporting governing bodies have developed protocol around safe physical contact but many sporting organisations are in the process of doing so. Further information can be obtained from the Child Protection in Sport Unit. Developing this awareness and knowledge base is essential and will help avoid situations of coaches claiming that physical contact is necessary when in fact it may not be necessary at all. In general, the following point should be borne in mind:

- Physical contact should only take place to help with complex skills or movements or to avoid injury
- Over handling must be avoided
- Any physical contact must not be invasive of sensitive parts of the body
- The pupil should always be easily observed by others
- Parents should not be discouraged from watching (by prior arrangement with the school and coach) performances or coaching sessions.

Protocol in Changing Rooms and Showers

- Swimming in public leisure facilities should take place in sessions which are specifically for use of schools to reduce public access to pupils
- Pupils should use single sex changing rooms and showers
- Only female staff and volunteers should supervise girls in showers and changing areas
- Staff should not shower at the same time as pupils
- In the event of a pupil misbehaving in the showers staff should take a minimal intervention approach in terms of what they say and any action they take to effectively resolve the situation. Staff can then follow up any further intervention when the pupil is fully dressed
- Team tactics should be discussed outside of the changing areas. If this is not possible, a suitable time should be agreed in advance when the member of staff can enter the changing rooms e.g. 10 minutes before play, and all pupils need to be changed into their sport kit before staff can enter

Photography

Refer to ICT Acceptable Use Agreement and GDST Data Protection guidelines.

Appendix B6 – Guidelines for the Arts (including all Arts media, music, dance and drama)

The GDST is committed to promoting the Arts and a broad spectrum of arts activities in schools through provision of a rich and diverse curriculum and a positive ethos of collaborative work with professional artists and arts groups. We believe education must provide opportunities for pupils to express their own ideas, values and feelings. The arts can provide a very potent channel for this expression and a means of giving it unique form and meaning.

In order to promote good safeguarding practice in the arts and protocol adhered to by major arts organisations, schools should ensure that:

- A member of staff is present during activities with visiting artists and arts groups in schools
- Adults involved in performing arts events have separate dressing rooms/changing/toilet facilities
- Individual tuition should only take place in rooms with glass windows where teacher and pupil are visible (notices covering vision panels should be removed during individual lessons)
- Quality of individual lessons should be monitored on both a planned and ad hoc basis
- The content and themes of all performances have been assessed and deemed to be appropriate for a school setting and appropriate to the age group of the students that are performing

Visiting Peripatetic Staff

In keeping with the Safeguarding Procedures (see section on Communication Plan) schools should ensure that visiting arts teachers (drama, dance, music or other arts media) have undergone the relevant safeguarding checks, have attended school safeguarding training and are familiar with and agree to adhere to the school Safeguarding and Child Protection Policy and GDST Safeguarding Procedures together with the following additional guidelines:

Safe Physical Contact in Arts Education

Physical contact may be necessary in some arts activities, for example, certain dance positions or movements. When teaching singing or a musical instrument it may be necessary to touch a pupil for example, to adjust posture, correct hand position, breathing, or embouchure. Touch is only appropriate when it is absolutely necessary to assist the pupil achieve an activity, position or dance movement.

Physical contact with pupils should take place only when it is absolutely necessary in relation to the particular arts activity and is in keeping with the school code of practice with regards to safe physical contact with pupils.

- Do not touch a pupil around the chest, waist, diaphragm or ribs to teach breathing
- Consider explaining the correction of movement or the point you are trying to explain in another way e.g. by you or another pupil demonstrating and then copying

Visiting Artists and Arts Groups

Schools are encouraged to provide visiting artists and arts groups with a copy of the School Safeguarding and Child Protection Policy and to develop a very simple, polite request statement of accepted practice based on the following guidelines regarding behaviour between visiting artists and arts groups and pupils. A sample statement is given below:

> Visiting artists and arts groups
>
> We are committed to promoting the arts and a broad spectrum of arts activities in our school through provision of a rich and diverse curriculum and a positive ethos of collaborative work with professional artists and arts groups. We are grateful for your services and unique contribution in helping us achieve this aim in our Arts education programme.

In order to promote good safeguarding practice in the arts, in accordance with protocol adhered to by major arts organisations, we request that you observe the following guidelines:

- Treat pupils with dignity and respect
- Address pupils by their first name
- Provide constructive feedback rather than negative criticism
- Seek to promote equality with regards to racial and cultural and religious backgrounds
- Avoid handling a pupil below the shoulder unless absolutely necessary; consider you or another adult or pupil demonstrating instead
- Avoid encouraging young pupils to sit on your lap
- Do not encourage or engage in inappropriate humour, chat or gestures (e.g. sexual innuendo or swearing)
- Do not give pupils your personal contact details
- Do not offer car journeys to pupils

Please report any concerns about a pupil's welfare or behaviour to your accompanying member of staff or the Head.

Appendix B7 - Safeguarding Children: GDST Checklist of checks required

SCHOOL STAFF

Including supply and support staff employed by the school.

	Appointment commencing . . .					
	Pre March 2002	1st March 2002 – August 2003	1st September 2003 – April 2007	1st May 2007 – 2nd April 2014	1st April 2012 - present	12th August 2015 - present
Name	YES	YES	YES	YES	YES	YES
Address	YES	YES	YES	YES	YES	YES
Date of birth	YES	YES	YES	YES	YES	YES
Qualifications required (including verification of QTS status where applicable)	YES	YES	YES	YES	YES	YES
CRB /DBS enhanced	n/a	YES	YES	YES	YES	YES
CRB/DBS standard	n/a	(YES)	(YES)	n/a	n/a	n/a
Barred List check (record if separate from CRB/DBS)	YES	YES	YES	YES	YES	YES
Prohibition from teaching check	n/a	n/a	n/a	n/a	YES (staff undertaking 'teaching work' only)**	YES (staff undertaking 'teaching work' only)**
Prohibition from management check	n/a	n/a	n/a	n/a	n/a	YES (staff in specific positions only)
Childcare disqualification (where applicable)	YES	YES	YES	YES	YES	YES
Overseas (including EEA*) check where applicable	n/a	n/a	YES	YES	YES	YES
Right to work in UK where applicable	YES	YES	YES	YES	YES	YES
References	Preferable	Preferable	YES	YES	YES	YES
Previous employment history	Preferable	Preferable	YES	YES	YES	YES
Medical fitness	Preferable	Preferable	YES	YES	YES	YES

Notes:

( ) Up to May 2007, a standard CRB check was acceptable for school staff (e.g. ancillary staff) not involved in regularly caring for, training, supervising or being in sole charge of pupils under 18.

Boarding staff have needed an enhanced CRB/DBS since 1st April 2002. Under the 2010 revision of the National Minimum Standards for Boarding Schools, as in day schools work may be started pending arrival of a DBS certificate as long as other checks have been completed and supervision arrangements are in place.

* The EEA check is a statutory requirement from 5 September 2016

** refer to section on Prohibition from Teaching checks for further details

AGENCY STAFF

	Employment commencing . . .					
	Pre March 2002	1st March 2002 – August 2003	1st September 2003 – April 2007	1st May 2007 – 31 March 2012	1st April 2012 - present	12th August 2015 - present
Name	YES*	YES*	YES*	YES*	YES*	YES*
Address	YES*	YES*	YES*	YES*	YES*	YES*
Date of birth	YES*	YES*	YES*	YES*	YES*	YES*
Qualifications required(including verification of QTS status where applicable)	YES*	YES*	YES*	YES*	YES*	YES*
CRB/DBS enhanced	n/a	YES*	YES*	YES*	YES*	YES*
CRB/DBS standard	n/a	(YES)*	(YES)*	n/a	YES*	n/a
Barred List check (record if separate from CRB/DBS)	YES*	YES*	YES*	YES*	YES*	YES*
Prohibition from teaching check	n/a	n/a	n/a	n/a	YES* (teaching staff only)***	YES* (staff undertaking 'teaching work' only)***
Prohibition from management check	n/a	n/a	n/a	n/a	n/a	YES* (staff in specific positions only)
Childcare disqualification where applicable	YES*	YES*	YES*	YES*	YES*	YES*
Overseas (including EEA**) check where applicable	n/a	n/a	YES*	YES*	YES*	YES*
Right to work in UK where applicable	YES*	YES*	YES*	YES*	YES*	YES*
References	Preferable	Preferable	YES*	YES*	YES*	YES*
Previous employment history	Preferable	Preferable	YES*	YES*	YES*	YES
Medical fitness	Preferable	Preferable	YES*	YES*	YES*	YES

Notes:

* Written confirmation of these is needed from the agency **before the individual starts work**. The school must also have sight of the original DBS disclosure whether it contains additional information or not

** The EEA check is a statutory requirement from 5 September 2016

*** refer to section on Prohibition from Teaching checks for further details

( ) Up to May 2007, a standard CRB check was acceptable for school staff (e.g. ancillary staff) not involved in regularly caring for, training, supervising or being in sole charge of pupils under 18.

SELF EMPLOYED* INDIVIDUALS – on a regular basis (not for 'one-off' visiting teachers)
(e.g. peris, instrument teachers, sports coaches, artist in residence etc.)

	Commencing . . .				
	Pre March 2002	1st March 2002 – August 2003	1st September 2003 – April 2007	1st May 2007 – 2nd April 2014	1st April 2012 - present
Name	YES	YES	YES	YES	YES
Address	YES	YES	YES	YES	YES
Date of birth	YES	YES	YES	YES	YES
Qualifications required (including verification of QTS status where applicable)	YES	YES	YES	YES	YES
CRB/DBS enhanced	n/a	YES	YES	YES	YES (and annual update check)
CRB/DBS standard	n/a	n/a	n/a	n/a	n/a
Barred List check (record if separate from CRB/DBS)	YES	YES	YES	YES	YES
Prohibition from teaching check	n/a	n/a	n/a	n/a	YES (all staff engaged in 'teaching work')*****
Overseas (including EEA****) check where applicable	n/a	n/a	YES	YES	YES
Right to work in UK where applicable	YES	YES	YES	YES	YES
References	Preferable	Preferable	YES	YES	YES
Previous employment history	Preferable	Preferable	YES	YES**	YES**
Medical fitness	Preferable	Preferable	YES	YES ***	YES***

Notes:

* This grid refers **only** to instructors who are self-employed. Any instructors employed by the school should be checked as for school staff.

** Use the ‘Safeguarding Information Form’ available on the GDST staff intranet.

*** Instructors should be asked to sign and date a declaration stating: “I know of no reasons on the grounds of mental or physical health why I should not be able to discharge the responsibilities required by my post.” (this has been incorporated into the form above)

**** The EEA check is a statutory requirement from 5 September 2016

***** refer to section on Prohibition from Teaching checks for further details

VOLUNTEERS

	Commencing . . .				
	Pre March 2002	1st March 2002 – August 2003	1st September 2003 – April 2007	1st May 2007 – 9th September 2012	10th September 2012 - present
Name	YES	YES	YES	YES	YES
Address	YES	YES	YES	YES	YES
Date of birth	YES	YES	YES	YES	YES
Qualifications required	n/a	n/a	n/a	n/a	n/a
CRB / DBS enhanced	n/a	n/a	n/a	YES*	YES***
CRB / DBS standard	n/a	n/a	n/a	NO	NO
Barred List check (record if separate from CRB/DBS)	n/a	n/a	n/a	YES**	YES***
Overseas check where applicable	n/a	n/a	n/a	n/a	n/a
Right to work in UK	n/a	n/a	n/a	n/a	n/a
References	n/a	n/a	n/a	YES	YES
Previous employment history	n/a	n/a	n/a	n/a	n/a
Medical fitness	n/a	n/a	n/a	n/a	n/a

Notes:

Schools do not need to check volunteers established before May 2007 continuing with their previous duties unless they give cause for concern.

May 2007 - September 2012:

* Regular volunteers should have an enhanced disclosure (including a barred list check) and need to have an informal interview and no contrary indications from anyone in the school community.

** The Trust recommended doing a barred list check for occasional volunteers who were not left unsupervised with children – this went beyond the statutory requirement

From September 2012:

*****Regular and unsupervised volunteers**

Note: the Trust's position is that schools should **err on the side of caution** and consider most volunteers who help out on a number of occasions at the school as falling into this category, as their contact with the

pupils may well be ‘regular’ at some point and schools may not be able to maintain the statutory level of ‘supervision’ (see section B5)

Volunteers in this category should have an enhanced disclosure and barred list check.

Regular unsupervised volunteers should also have an informal interview and no concerns raised by others in the school community (from September 2016 this is a GDST recommendation rather than a requirement).

Such volunteers should be entered on the central register.

Occasional and/or supervised volunteers – see section B5. Volunteers in these categories who have had checks done should be entered on the central register.

SCHOOL GOVERNING BOARD MEMBERS

	Appointment commencing . . .					
	Pre March 2002	1st March 2002 – August 2003	1st September 2003 – April 2007	1st May 2007 – 9th September 2012	10th September 2012- present	1st September 2019 - present
Name	YES	YES	YES	YES	YES	YES
Address	YES	YES	YES	YES	YES	YES
Date of birth	YES	YES	YES	YES	YES	YES
Qualifications required	n/a	n/a	n/a	n/a	n/a	n/a
CRB / DBS enhanced	n/a	n/a	n/a	YES*	YES	YES
CRB / DBS standard	n/a	n/a	n/a	n/a	n/a	n/a
Barred List check (record if separate from CRB/DBS)	n/a	n/a	n/a	YES*	YES***	YES***
Prohibition from management check	n/a	n/a	n/a	n/a	n/a	YES****
Overseas check where applicable	n/a	n/a	n/a	n/a**	n/a**	n/a**
Right to work in UK where applicable	n/a	n/a	n/a	n/a	n/a	n/a
References	n/a	n/a	n/a	n/a	n/a	n/a
Previous employment history	n/a	n/a	n/a	n/a	n/a	n/a
Medical fitness	n/a	n/a	n/a	n/a	n/a	n/a

Notes:

* All existing members serving from September 2009 should have had their enhanced disclosure certificates issued by the end of the summer term 2009.

** Overseas checks are not required unless the SGB member works directly with children.

*** The GDST advises that a barred list check should be undertaken for school governing board members on the understanding that given their role they are likely to come into regular and unsupervised contact with pupils.

**** From September 2019 it is GDST policy for SGB members to have a prohibition from management check

SGB members are not members of a proprietor body and therefore do not require right to work in the UK check.

PROPRIETORS (Members of the Council of the Trust and Members of the Academy Trust Board)

	Appointment commencing . . .					
	Pre March 2002	1st March 2002 – August 2003	1st September 2003 – April 2007	1st May 2007– 9th September 2012	10th September 2012 - present	12th August 2015 - present
Name	YES	YES	YES	YES	YES	YES
Address	YES	YES	YES	YES	YES	YES
Date of birth	YES	YES	YES	YES	YES	YES
Qualifications required	n/a	n/a	n/a	n/a	n/a	n/a
CRB/DBS enhanced	n/a	n/a	YES*	YES	YES	YES
CRB/DBS standard	n/a	n/a	YES*	n/a	n/a	n/a
Barred List check (record if separate from CRB/DBS)	n/a	n/a	YES	YES	NO**	NO**
Prohibition from management	n/a	n/a	n/a	n/a	n/a	YES
Overseas check where applicable	n/a	n/a	YES	YES	YES	YES
Right to work in UK where applicable	YES	YES	YES	YES	YES	YES
References	n/a	n/a	n/a	n/a	n/a	n/a
Previous employment history	n/a	n/a	n/a	n/a	n/a	n/a
Medical fitness	n/a	n/a	n/a	n/a	n/a	n/a

Notes:

* Between September 2003 and May 2007 an enhanced CRB was only required if the proprietor's duties included regularly caring for, training, supervising or being in sole charge of persons aged under 18.

** Under the Protection of Freedoms Act 2012 it is no longer possible to undertake this check.

Information held at Trust Office and circulated to schools.

Appendix B8a - Checklist of DBS requirements by staff category

Category of individual (including full and part time)	Disclosure required - yes / no	Type of Disclosure	Disclosure obtained by whom	Info on all relevant checks to be held on Central Register - yes / no
EMPLOYED STAFF				
All teaching and support staff, (part and full time, permanent and fixed term contracts)	Yes	Enhanced	School	Yes
Resident Staff Resident family members and resident guests over 16	Yes Yes	Enhanced Enhanced	School School	Yes Optional
Staff joining who have lived overseas (including both foreign and UK nationals)	Yes DBS checks do not cover offences committed abroad – only those on the Police National Computer.	Enhanced. For applicants from countries where criminal record checks cannot be made where considered appropriate schools should obtain and follow up extra references and do additional checks **prior to the person starting work.**	School	Yes
Before- and after-school staff	Yes	Enhanced	School	Yes
Sports coaches / instructors	Yes	Enhanced	School	Yes
Invigilators	Yes	Enhanced	School	Yes
Self employed individuals – employed directly by GDST	Yes	Enhanced It is a requirement for peris to subscribe to the DBS 'update' service	School Schools should do an annual check using the update service	Yes
Supply staff – employed directly by GDST i.e. teachers, admin temps, casual staff on zero hours contracts	Yes	Enhanced	School	Yes
Trust Office staff	Yes	Enhanced	Trust Office	Yes, for those who visit regularly. Trust Office HR will

				provide relevant details on request.
STAFF NOT DIRECTLY EMPLOYED, i.e. agency staff, self-employed, those provided by external organisations				
Supply staff employed via an agency	Yes	Enhanced	Written confirmation that all relevant checks have been satisfactorily completed (together with date of check and disclosure number) required direct from the agency/ organisation on each individual **before individual starts.** The school must also have sight of the original DBS disclosure.	Yes
Self-employed individuals e.g. paid by parents	Yes	Enhanced It is a requirement to subscribe to the DBS 'update' service	School or by the person them self via an external umbrella body Schools should do an annual check using the update service	Yes
Any staff or workers on school premises when pupils are not present	No			No
VOLUNTEERS				
Regular unsupervised volunteers	Yes	Enhanced	School	Yes, but details of DBS check, references, informal interview and identity check only. No requirement to keep photocopies of ID documents once checked.
Volunteers – occasional or supervised	No			Occasional volunteers do not need to be on the Central Register.

Secondary school pupils on work experience or similar	Should be considered	Enhanced	Work experience provider	No
VISITORS				
Visitors who may have only brief contact with children but in the presence of GDST staff – e.g. those carrying out repairs or servicing equipment	No However if it is possible that these workers may come into unsupervised contact with children the school must ensure they have been DBS checked			No
Unsupervised visitors e.g. Educational Psychologists, Connexions Service staff	Yes	Enhanced	The external company or service or the person them self – **before the individual starts**	No An identity check must be carried out that the individual arriving at school is the one that has been referred.
TRUSTEES AND GOVERNORS				
Members of the Council of the GDST	Yes (the Chairman has to be granted a special DBS signed off by the Secretary of State for Education as s/he is considered the proprietor)	Enhanced (however this should not include a barred list check, but must include a prohibition from management check)	Trust Office	Yes Trust Office Governance will provide relevant details on request.
Members of the Academy Trust Board including members of any committee to whom the Academy Trust delegates responsibilities	Yes	Enhanced (however this should not include a barred list check, but must include a prohibition from management check)	Trust Office	Yes Trust Office governance will provide relevant details on request
Members of Local School Governing Bodies	Yes	Enhanced (usually including a barred list check on the understanding that the role will involve regular unsupervised contact with children)	School	Yes

Appendix B8b - Summary of all pre-recruitment checks and how to undertake them

Name of check	How to do the check	When
ID	Schools see original document(s) including photo ID docs such as passport and/or driving licence	At interview stage. ID confirmed before starting work & as part of DBS application process
Enhanced DBS check	Online application using Atlantic Data's system or 'Status check' using DBS Update Service (if the person has registered for the service) https://secure.crbonline.gov.uk/crsc/check?execution=e1s1	Disclosure certificate should ideally be seen before starting work, but staff may start work under certain conditions as long as the application has been submitted
Children's Barred List check	Either as part of the DBS check Or If done as a separate check, from the Employer Access Online Service via Teachers' Pensions Online. Schools must register and pay to use the service.	Before starting work
Prohibition from management check	Either as part of the DBS check (provided the correct option is selected on the form) Or If done as a separate check, via the Teacher Regulation Agency (TRA) Teacher Services. This is a free, online service, but schools must first register to use it via employer.access@education.gov.uk	Before starting work
Prohibition from teaching check	Via the Teacher Regulation Agency (TRA) Teacher Services as per above	Before starting work
Overseas check including EEA teacher sanctions	EEA check via the Teacher Regulation Agency (TRA) Teacher Services as per above Other overseas checks as relevant according to individual circumstances	Before starting work
Childcare disqualification check	Staff make a signed declaration on the GDST CDD form. On a periodic basis, schools ask relevant staff for any further declaration	Before starting work

Right to work in the UK	**Schools see original documents as per Home Office guidance.** **Or** **For non-EEA nationals and EEA nationals with settled status under the EU Settlement Scheme only an online check via https://www.gov.uk/employee-immigration-employment-status**	**At interview stage**
Qualifications	**Schools see original documents and for teachers check QTS status, completion of induction and probation via the Teacher Regulation Agency (TRA) Teacher Services as per above**	**At interview stage**
References	**Schools apply for professional references using GDST template letters and forms**	**Before interview ideally**
Employment history	**Information given by applicant on GDST application form. Scrutinised appropriately according to GDST guidance**	**As part of initial recruitment process**
Medical fitness to work / suitability	**Staff with regular access to children: Applicant completes GDST medical questionnaire, which is seen and assessed only by the Head and, if needed, a doctor contracted by the GDST** **Other workers or individuals engaged i.e. self employed individuals may make a declaration as per GDST guidance**	**Only after a conditional offer of employment is made** **Before starting work**

Appendix B9 – Contractors' Safeguarding Leaflet

Safeguarding Leaflet

The Girls' Day School Trust ("GDST") takes its safeguarding responsibilities very seriously, and is committed to promoting the welfare of children. This means, amongst other things, providing a safe and secure environment for children and preventing unsuitable people having opportunity for contact with children.

In order to help GDST achieve the above aim, GDST requests that you agree to comply with the following requirements at all times:

- To sign in and out of a site office or school reception
- To wear an identity and visitor badge
- To abide by each site's entry and exit procedures
- To contact the School Liaison (identified in the relevant Service Order), if access is required to part of the site where children may be present
- To act professionally and appropriately

Each GDST school site has a Designated Safeguarding Lead(s) appointed to take responsibility for child protection matters. If you witness anything which gives you cause for concern, you must contact the School Liaison without delay so the concern can be reported to the Designated Safeguarding Lead.

If you have any queries, please contact the School Liaison.

Appendix B10 – Childcare Disqualification Declaration Form
FORM CDD

GDST
GIRLS' DAY SCHOOL TRUST

CHILDCARE DISQUALIFICATION DECLARATION

The role you are applying for is subject to the disqualification provisions of the Childcare Act 2006 and the Childcare (Disqualification) Regulations 2009. This means that if your name is on the Children's Barred List, or you meet wider disqualification criteria, you will be disqualified from:

- teaching, supervising or caring for pupils in the Early Years Foundation Stage (EYFS), or
- providing before or after school childcare for pupils up to the age of eight (Year 3), or
- being directly concerned in the management of this provision (for example, as part of the school's Senior Leadership Team).

The childcare disqualification criteria relevant to childcare in non domestic settings are (broadly):

- being placed on the Children's Barred list (formerly List 99),
- being charged with, cautioned for, or convicted of a serious violent or sexual offence,
- being disqualified from caring for a child (including one's own)

DECLARATION – TICK ONE OF THE FOLLOWING BOXES:

☐	I do not meet any of the childcare disqualification criteria.
☐	I have a waiver from Ofsted and enclose a copy in a sealed envelope, marked as confidential.
☐	I am disqualified, or unsure whether I am disqualified, and would like further information.

NAME (PLEASE PRINT) ……

SIGNATURE …… **DATE** ……

NOTES

1. Further details of the disqualification criteria, including relevant offences, protected and spent cautions and convictions are here: www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006
2. **You do not need to provide details of any protected or spent cautions or convictions, or any details relating to those living or working in your household**
3. Providing false information could result in your application being rejected, or summary dismissal if you have been appointed, and possible referral to the police and the Teaching Regulation Agency.
4. We will not view information marked as confidential unless you are shortlisted for interview. We guarantee that this information will only be seen by those who need to see it as part of the recruitment process. If you are not shortlisted, the unopened information will be destroyed securely. Any information not destroyed will be processed in accordance with our privacy policy (https://www.gdst.net/privacy-notice).

Appendix B11 - Safeguarding Audit Procedure

Aim:
To ensure that GDST schools meet all regulatory and legal requirements, with regards to the Safeguarding of children, as laid down by ISI and the DfE.

Process:

1. Dates for each school's annual safeguarding audit for the following year are scheduled on a termly basis in consultation with schools, each school being audited within a year of the previous visit.
2. The Compliance Manager contacts each school in advance of the date of the audit, with a copy of the latest version of the Audit Report, a list of documents to be made available for the visit and a template timetable for the day. Schools are encouraged to review their practice with the help of the report template before the date of the visit;
3. Before the visit, the Inspection and Safeguarding Consultant checks the school's website and the school's SCR
4. The Safeguarding Audit is carried out in each school by the Inspection and Safeguarding Consultant. During the course of the day, questions will be asked and checks made according to the safeguarding audit script, which is reviewed regularly;
5. At the end of the day, verbal feedback will be given to the Head. The outcomes of the audit will be recorded on the Safeguarding Audit Report and Accompanying Action Plan, which is sent to the Compliance Manager within 7 days of the audit visit;
6. The Compliance Manager checks through the report and sends it to the Head of the school. The Head is given 14 days to return the Action Plan with actions recorded and signed to confirm they have been carried out;
7. In certain circumstances a re-audit will be carried out within 1 term of the previous visit
8. Should any school not make the required progress towards compliance within a reasonable time scale the matter will be reported to the Director of Innovation and Learning, who will address the issue with the Head as a matter of urgency;
9. A record of the Safeguarding Audit Reports and Action Plans are stored centrally;
10. The Director of Innovation and Learning is updated regularly of the outcome of audit visits;
11. A summary of the outcome of audit visits is presented to the Audit Committee at each committee meeting;
12. An extract from the Audit Committee meeting minutes – relating to the consideration of the school's audit visit and Action Plan – is sent to each school once the minutes of the meeting in question have been approved.

Appendix B12

Guidance on drafting a protocol for visiting speakers

Schools do not have to create a separate *Prevent* policy. But statutory guidance has introduced a new requirement that policies "set out clear protocols for ensuring that any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised." This protocol can stand alone or be part of another policy or document.
Schools must ensure that all visiting speakers are suitable. There is scope for discretion as to how.

When it comes to inspection, the burden is on the school to demonstrate to inspectors how they meet the duty. Inspectors will expect verbal assurances from schools to be backed up by documentary evidence that protocols are put into practice on the ground.

The means by which schools ensure the suitability of their speakers are not prescribed. Schools need not confine their approach to the usual formal checks; internet searches, for example, may sometimes be more instructive than formal vetting checks.
An external speaker protocol should include the following:
General limiting statement, e.g. that:

- All staff and pupils have the right to study without fear of intimidation, harassment and threatening or extremist behaviour.
- The school promotes tolerance and respect for diversity, and respect for alternative views.
- The school promotes reasoned, informed discussion of sensitive issues.
- The protocol complements the GDST Safeguarding Policy and Procedures, and other policies such as Anti-Bullying, Equal Opportunities and ICT Acceptable Use Agreements.
- Speakers are expected to abide by the principles set out by the school, i.e. avoiding:
    - Gratuitously offensive or intolerant use of language
    - Intentional demeaning of individuals or groups defined by ethnicity, race, religion, sexuality, gender, disability, age.

Overarching strategy:
Set out who qualifies for checks: all speakers, or those whom risk assessment indicates warrant closer attention. Risk is minimised by ensuring that appropriate checks are carried out at an appropriate stage. The aim is to identify potential situations in which the content of a visiting speech is likely to undermine the values and aims of the school, and the policy on British Values; or if the speaker is associated with any organisation that advocates terrorism.

Description of the various sources that might be used for pre-invitation checks:

- ✓ Recommendations/references
- ✓ Research on open source:
    - Published material
    - Previous speech content
    - Known affiliations
    - Guest/speaker aliases.

Schedule of how checks are documented and referenced; and how and by whom they are collated.

Chain of responsibility: set out who is responsible for signing off on speaker approvals, including (and especially) those in which speakers are invited by pupils (e.g. to speak at pupil-run societies).

Appendix B13

Checking for spy cameras – notes of guidance

Checking for something that is deliberately hidden is not a simple task. These tips are intended to give some guidance on how best to go about this:

- Prevention is as valuable as detection. Making it public knowledge that the school carries out regular checks for hidden cameras (without publishing a precise rota), and that all staff are vigilant in this respect, should help to deter anyone considering filming covertly in a school
- High risk areas: toilets and changing room areas are the highest risk areas for obvious reasons. However do not discount other areas such as cloakrooms or classrooms
- Browsing the internet for hidden or spy cameras can give you an idea of how small these cameras can be, and the everyday objects they can be concealed in, such as clocks, photo frames and even water bottles
- Possible indicators of a hidden camera:
    - Wires in unexpected places or that don't seem to go anywhere
    - Lights (such as tiny red or green 'power on' indicator lights that may show up in the dark)
    - Small holes in walls or other places
    - A soft click or buzzing sound in reaction to movement
- Common places to hide a camera:
    - Mirrors
    - Smoke detectors
    - Air filter equipment
    - Books
    - Wall décor
    - Electrical outlets or adaptors
- Skilfully hidden cameras may be virtually impossible to detect, but all staff can be alert to unexplained changes in their environment: unfamiliar objects, things that have been moved or seem out of place, new equipment or fittings that appear without warning. It's worth questioning these changes to ensure they have a justified explanation.