ENCOURAGING EXCELLENCE, NURTURING TALENT!

SPORTING CHANCES GROUP

CHILD PROTECTION & SAFEGUARDING POLICY

Lead	Emma Marshall
Last Reviewed	October-2025
Next Review Date	October-2026

To be reviewed **annually**.

This policy is enforced across **all** Sporting Chances Group provisions.

SPORTING CHANCES SURREY

SPORTING CHANCES OUTREACH

SPORTING CHANCES MINI

CREATIVE HAIR&LASHES

SPORTING CHANCES ONLINE

SPORTING CHANCES FITNESS

SC FOOTBALL ACADEMY

CONTENTS

Safeguarding Statement 2025/26 6

Key Personnel 7

Policy Aims 7

Key Terminology 9

Safeguarding & Promoting the Welfare of Children 9

Legislation & Statutory Guidance 11

Equality Statement 13

Overview 14

Working together 14

Supporting Children 14

Our Responsibilities 14

SEND & Vulnerability Children with Special Education Needs & Disabilities (SEND) 15

Prevention / Protection 16

Children who are Lesbian, Gay, Bisexual, or Gender Questioning 17

Safer Recruitment 18

KCSIE P.57-90 18

Roles & responsibilities 21

All Staff 21

Provision of Early Help 23

SCG Managers 23

The Designated Safeguarding Lead 25

The Deputy Designated Safeguarding Lead(s) 28

The Senior Leadership Team (SLT) 28

Data Protection 31

Child Protection Procedures **32**

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must: 32

Following a report of concerns the DSL must: 33

Dealing with Disclosures **34**

Guiding Principles: The R's 34

Child-on-Child Abuse **37**

Bullying 37

Anti-Bullying / Cyberbullying 37

Risk Assessment 38

Outcomes of Child-on-Child Abuse Incidents 39

Ongoing Response 39

Physical Abuse 40

Online Safety / Cybercrime **41**

Information Security & access Management 41

Racism **43**

Radicalisation, Extremism & Terrorism **43**

Domestic Abuse **47**

Child Exploitation **48**

Child Sexual Exploitation (CSE) 48

Child Criminal Exploitation (CCE) **& Gangs** **50**

Sharing Nudes, Semi-Nudes & Youth Produced Sexual Imagery **51**

Female Genital Mutilation (FGM) 54

Forced Marriage **55**

Honour-Based Abuse **55**

One Chance Rule 56

Private Fostering Arrangements 56

Looked After Children 57

Children Missing Education 57

Restrictive Physical Intervention 58

Whistleblowing 59

Safeguarding Concerns & Allegations Against Adults who Work with Children 59

Referral to the Local Authority Designated Officer (LADO) Procedure 59

Appendix 1: What is child abuse? 61

What is Abuse, Neglect & Exploitation? 61

Abuse & Neglect 62

Physical abuse 62

Emotional abuse 62

Sexual abuse 63

Neglect 63

Child-on-Child Abuse 64

Appendix 2: Key indicators of abuse or neglect 65

Indicators of Emotional Abuse 65

Indicators of Physical abuse 66

Indicators of Sexual abuse 67

Physical Indicators 68

Behavioural Indicators 68

Indicators of Neglect 70

Physical Indicators 70

Behavioural Indicators 70

Appendix 3: Part 3 Safer Recruitment (KCSIE, 2025) 71

Appendix 4: Key Contacts **108**

Croydon 108

Sutton 109

Surrey Children's Services 110

General Contacts 110

Appendix 5: SCG's Statutory Duty & Guidance Documents **111**

Appendix 6: Record Keeping Documents **113**

Safeguarding Incident / Concern Form 114

Student Profile 116

Safeguarding Chronology 117

Record of Actions / Contact 118

SAFEGUARDING STATEMENT 2025/26

"SAFEGUARDING IS EVERYONE'S RESPONSIBILITY."

At Sporting Chances Group (SCG) we recognise our moral and statutory duty to safeguard and promote the welfare of all children. Our students' welfare and safety are at the heart of our ethos and in everything we do. We make every effort to provide an environment in which children and adults thrive, feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

When the term 'staff' or 'SCG Staff' is used, it includes anyone who works for or works on behalf of the SCG in any capacity. Thus, this policy applies to but is not limited to, senior managers/leaders, the Director, paid staff, volunteers, sessional workers and agency staff. The policy's purpose is to provide the framework needed in order to keep children safe and secure in provisions, online and whilst under the care of the Outreach Team.

The policy also informs parents, carers and other stakeholders how the SCG will safeguard their children whilst they are in our care. The SCG abides by the guidance outlined in the following key principles:

- The welfare of the child is paramount
- Maintaining an attitude of "It could happen here"
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so
- All children have a right to be protected from harm and abuse, receiving the right help at the right time
- All SCG staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the provision or in the community, taking into account contextual safeguarding, in accordance with statutory guidance

KEY PERSONNEL

DAVID JOHNSON	Director	*david@sportingchances.org*
EMMA MARSHALL	Designated Safeguarding Lead (DSL)	*emma@sportingchances.org*
ELLIE PASKIN	Deputy Designated Safeguarding Lead (DSL)	*ellie@sportingchances.org*

POLICY AIMS

The aims of this policy are to:

1. Ensure that all SCG staff and volunteers understand their responsibilities with regard to safeguarding and child protection
2. Ensure that all staff are trained to understand the risk factors for all child protection, safeguarding and welfare concerns and know the indicators of abuse, neglect, and exploitation, and know the appropriate reporting mechanism
3. Create and maintain an environment where all students feel secure, are encouraged to communicate, and are listened to
4. Ensure that every student understands that they can report any concern to any member of staff, knowing they will be believed and never made to feel like raising a concern is a problem. From an initial introduction during the induction process and clear posters throughout the provisions
5. Ensure that staff listen to victims well and know how to report any concerns about sexual violence or harassment between peers
6. Having a procedure to deal with any issues of child-on-child abuse which includes a robust and credible reporting system which is well-promoted, accessible, and simple to understand
7. Ensure a zero-tolerance attitude towards any form of child-on-child sexual harassment or sexual violence, and appropriate responses to issues we encounter – and never adopting the attitude that sexualised harassment is “just banter” or “boys being boys”
8. Ensure all staff understand that, even when it isn’t formally reported, sexual harassment

and sexual violence is happening

9. Educate students to keep themselves safe, including online, from all forms of abuse, bulling, harassment, or exploitation

10. Ensure that all concerns of a child protection or safeguarding nature are addressed swiftly and effectively and ensuring robust, timely referrals are made to other agencies in line with local safeguarding protocols

11. Ensure effective links with relevant agencies (including but not limited to Early Help providers, the Police, Health and Social Care) in all matters regarding safeguarding, child protection and welfare. Likewise enabling us to effectively contribute to Early Help, assessments of need and support for those children concerned

12. Support students who are subject to child protection plans and contributing to the implementation of the plan

13. Ensure that the cohort of students who have a social worker, or have been or are currently looked after, are supported to stay in education and achieve good educational outcomes

14. Ensure record keeping is meticulous, including written records of concerns about students, even where there is no need to refer the matter immediately (this includes recording dates, times, people responsible, and actions), and ensuring all records are kept securely and shared appropriately

15. Ensure detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions, particularly by the Designated Safeguarding Lead and the Deputy Safeguarding Lead. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program

16. Ensure the suitability of all staff through safer recruitment practices, including verification of their identity, qualifications, and a satisfactory enhanced DBS check including children's barred list information (according to ***Keeping Children Safe in Education (KCSIE) 2025*** guidance), and a single central record is kept for audit

17. Maintain clear procedures in line with the latest guidance for reporting allegations against staff members

18. Ensure that parents and carers also have an understanding of the responsibility placed on SCG and its staff for safeguarding, promoting the welfare of children and child protection

19. Maintain awareness of those students who have inexplicable and/or persistent absences from education or who are missing from education such as our provision(s)/school, notifying the Local Authority in line with ***Children Missing Education*** protocols.

KEY TERMINOLOGY

SAFEGUARDING & PROMOTING THE WELFARE OF CHILDREN

At SCG, safeguarding and promoting the welfare of children in line with KCSIE 2025 means:

1. **Early help & intervention** – the provision of unwavering help and support as soon as a problem emerges for a child. More information on early help is on the early help process can be found in the ***Working Together to Safeguard Children*** guidance.
2. **Protection from maltreatment** – inside or outside of the SCG provision, inside or outside of the home, as well as online and in the community.
3. **Mental Wellbeing** – openly discussing the importance of positive psychology and mindset and actively preventing the impairment and worsening of children's mental and physical health development.
4. **Safe & effective care** – every effort is made to ensure that children grow up in circumstances consistent with the provision of safe and effective care.
5. **Best outcomes** – taking the necessary action to ensure that all children achieve the best possible outcomes, enabling them to have optimum life chances, so they can enter adulthood successfully.

CHILD PROTECTION	is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
ABUSE	is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. ***Appendix 1*** explains the different types of abuse.
NEGLECT	is a form of abuse and is 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. ***Appendix 1*** defines neglect in more detail.
SEXTING	(also known as youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

The following 3 safeguarding partners are identified in ***KCSIE 2025*** (and defined in the ***Children Act 2004***, as amended by chapter 2 of the ***Children and Social Work Act 2017***). They will make arrangements to work together to safeguard and promote the welfare of local children, **including identifying and responding to their needs:**

1. The local authority (LA).
2. A clinical commissioning group for an area within the LA.
3. The chief officer of Police for a Police area in the LA area.

EARLY HELP	means providing support as soon as any needs emerge or are identified at any point in a child's life.
STAFF	refers to all those working for or on behalf of SCG, full or part time, temporary or permanent, in either a paid or voluntary capacity.
CHILD(REN)	includes everyone under the age of 18. Overall, this will apply to students of our provision; however, the policy will extend to visiting children and students from other establishments.
PARENTS	refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.
SOCIAL CARE	refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.
MAP	refers to the Multi-Agency Partnership.
C-SPA	refers to the Children's Single Point of Access Introduction.

LEGISLATION & STATUTORY GUIDANCE

This SCG policy has derived from a variety of legislative provisions and statutory guidance. In particular, it is based on good practice found in:

- *Keeping Children Safe in Education* (2025)
- *Working Together to Safeguard Children* (2023)
- *Maintained Schools Governance Guide*

Our Child Protection & Safeguarding Policy complies with all of this guidance and is updated with local arrangements agreed and published by the 3 local safeguarding partners.

This policy is also based on several pieces of legislation:

- Ofsted's strategy for 2017 to 2022, which is underpinned by 3 core principles: children and students first, independence, and accountability and transparency.
- The Education Act 2002 (Section 175), which places a duty on schools and local authorities to safeguard and promote the welfare of students.
- Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015, which places a duty on non-maintained special schools to safeguard and promote the welfare of students at the school.
- The Children Act 1989 (and 2004 amendment), which gives a broad framework for the care and protection of children and includes provisions for Local Authority inquiries, care proceedings, and emergency provisions.
- Female Genital Mutilation Act 2003 (Section 5B [11]), as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the Police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. Responsibilities for safeguarding and supporting girls affected by FGM are found in Statutory Guidance on FGM.
- The Rehabilitation of Offenders Act 1974, which outlines provisions for when people with criminal convictions can work with children.

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Statutory Guidance on the Prevent Duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

Other statutory provisions and guidance relevant to child protection and safeguarding include:

- The Education (Pupil Information) (England) Regulations 2005.
- The Sexual Offences Act, 2003, Home Office.
- Teaching Online Safety in Schools, 2019, Department for Education (DfE).
- Guidance on Sharing Information.
- Guidance on Child-on-Child Sexual Abuse.
- Guidance on Nudes and Semi-Nudes.
- Teaching Standards.

SCG has also read and incorporated Ofsted's review of sexual abuse in schools and colleges published in June 2021 into this and connected policies and procedures.

A full list of the guidance this policy has referred to, and which staff can refer to for further information, can be found in ***Appendix 4: SCG's Statutory Duty & Guidance Documents***.

The management takes seriously it's responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our provision to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and management in SCG.

EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (*see SEND section*).
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after.

OVERVIEW

WORKING TOGETHER

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children. Whilst SCG will work openly with parents as far as possible, we reserve the right to contact Social Care or the Police, without notifying parents if this is believed to be in the child's best interests.

We comply with the ***Disqualification under the Childcare Act 2006*** guidance issued in August 2018.

SUPPORTING CHILDREN

SCG supports all children holistically and without prejudice or judgement:

- We recognise that our provisions may provide a safe place and stability in the lives of children who have been abused or who are at risk of harm.
- We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth, and as a consequence, may have a need for a mental health first aid trained staff member.
- We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

OUR RESPONSIBILITIES

Through our daily work with children and young people we will:

- Promote the wellfair of children as well as a trauma informed, nurturing, caring, safe and positive environment across all provisions.
- Encourage self-esteem and self-assertiveness, through the curriculum and through mentoring within our provisions and Outreach Programme.
- Ensure students are taught to understand and manage risk through personal, social, health and economic (PSHE) education, Relationships Education (primary), Relationships and Sex Education (RSE) Health Education, and through all aspects of life, including staying safe online.

- Respond sympathetically to any requests for time out to deal with distress and/or anxiety.
- Offer details of helplines, counselling, or other avenues of external support.
- Liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
- Notify Social Care without delay if there is an immediate risk of significant harm.
- Provide continuing support to children about whom there have been concerns who leave the provision by ensuring that information is shared confidentially with the child's new setting.
- Ensure the records are forwarded as a matter of priority and within statutory timescales.
- Read and adhere to government guidance to support children involved in any aspect of the court system. Guidance on this can be found on p.152 of ***KCSIE 2025***, and in the ***Young Witness Booklet for 5 to 11 Year Olds*** and the ***Young Witness Booklet for 12 to 17 Year Olds*** publications.

SCG recognises that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their parents, those with parental responsibility or carers have a role to play in safeguarding children.

All staff who work directly with children must read ***Part 1 and Annex B of KCSIE 2025***. Staff who do not work directly with children can read the summary of Part One, where this is considered to be appropriate.

SEND & VULNERABILITY CHILDREN WITH SPECIAL EDUCATION NEEDS & DISABILITIES (SEND)

SEND & Vulnerability Children with special education needs and disabilities (SEND) face additional safeguarding challenges, SCG acknowledges that barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEN and disabilities can be disproportionally impacted by things like bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers day-to-day safeguarding practice will take into account these challenges and this will also be a key topic in annual safeguarding training.

PREVENTION / PROTECTION

We recognise that we play a significant part in the prevention of harm to our children by providing SCG children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

SCG will:

- establish and maintain an ethos where students feel safe and secure, are encouraged to talk and are always listened to;
- include regular consultations with students e.g., through questionnaires, participation in anti-bullying activities, asking students whether they feel safe in the setting;
- ensure that all children know they can access a trained adult in the provision whom they can approach if they are worried or in difficulty;
- include safeguarding across the curriculum, including PSHE, opportunities which equip students with the skills they need to stay safe from harm and to know to whom they should turn for help, particularly including anti-bullying work, online-safety, and accessing emergency services; and
- ensure all staff are aware of provision guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

With respect to SEND students, SCG staff will assess whether additional pastoral and communication support is required and implement.

Further information about ways to support SEND children can be found in the department's:

- ***SEND Code of Practice 0 to 25 years***; and
- ***Supporting Pupils at School with Medical Conditions***

And from specialist organisations such as:

- **The Special Educational Needs and Disabilities Information and Support Services** (SENDIASS) - SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service. Local IAS services can be found using the following link: ***councilfordisabledchildren.org.uk***.

- **Mencap** - Represents people with learning disabilities, with specific advice and information for people who work with children and young people: ***mencap.org.uk***
- **NSPCC** - Safeguarding children with special educational needs and disabilities (SEND): ***learning.nspcc.org.uk/***, and
- **NSPCC** - Safeguarding child protection/deaf and disabled children and young people ***learning.nspcc.org.uk/***

CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL, OR GENDER QUESTIONING

KSCIE 2025 states that the guidance in this section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.'

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, SCG staff must be aware that they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are and should take necessary steps to protect the child from harm

SCG staff should be sensitive to The Cass review which identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools and APs should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Where a child is presenting with questions around their gender, every effort should be made to support them in a sensitive, confidential and trusting way. It is vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with trusted members of staff.

SCG staff should seek to reference DfE guidance *Gender Questioning Children: when deciding how to proceed (https://tinyurl.com/GQC-guide)* for further guidance.

SAFER RECRUITMENT

The children at SCG tend to be very vulnerable young people. It is therefore paramount that at SCG we **strictly** adhere to safer recruitment procedures as set out in KCSIE 2025. It is vitally important that we at every opportunity make clear that SCG is an alternative provision (AP) that safeguards and promotes the welfare of children and that this is reflected through our robust recruitment procedures that seek to strongly deter and prevent individuals who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities with SCG.

NO candidate will be deemed suitable to work at SCG without having successfully gone through each stage of the Safer Recruitment Process, achieved a clear Enhanced, Children's Barred List DBS check, identity verification and at least two satisfactory and verified references with one from their current employer who has seniority.

It is policy that Senior Leaders and all staff who recruit into SCG, must read and strictly adhere to the Safer Recruitment 'Recruitment and Selection Process' as outlined in Part 3 of KCSIE 2025 and Appendix 3 of this policy.

SCG firmly adheres to the entire Safer Recruitment Process. A brief summary of the key features of Part 3 – Safer Recruitment taken from KCSIE 2025 is listed below for all staff to be knowledgeable of the stringent rules we follow and enforce with respect to recruitment:

KCSIE P.57-90

All offers of appointment should be conditional until satisfactory completion of the mandatory pre-employment checks. **All schools [APs] and colleges must:**

- Verify a candidate's identity. It is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines canbe found on the GOV.UK website.
- Obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). When using the DBS update service, SCG will still need to obtain the original physical certificate.

- Obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available; See paragraph 267-268 on how to obtain a separate children's barred list check. This does not apply to 16-19 academies, special post-16 institutions and independent training providers.
- Verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.
- Verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then schools and colleges should follow advice on the GOV.UK website.
- If the person has lived or worked outside the UK, make any further checks the school or college consider appropriate.
- Verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation. Teacher prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by the TRA. Pending such consideration, the Secretary of State may issue an interim prohibition order if it is considered to be in the public interest to do so. The TRA's role in making prohibition orders and the processes used to impose them are set out in the publications: ***Teacher Misconduct: Disciplinary procedures for the teaching profession*** and ***Teacher Misconduct: the prohibition of teachers***.
- Whilst SCG does not currently have a governing body, should SCG move to forming one, we will ensure that a scetion 128 check is carried out for all governors to prevent a disqualified/barred individual is not recruited into role. SCG will also reference Prohibiting unsuitable individuals from managing independent schools.

In addition:

- Independent schools, including academies and free schools, must check that a person taking up a management position as described at paragraph 262 is not subject to a section 128 direction made by the Secretary of State.
- All schools must ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012.

- Before employing a person to carry out teaching work in relation to children, colleges must take reasonable steps to establish whether that person is subject to a prohibition order issued by the Secretary of State.

SCG adheres to ***The Information Commissioner's Office*** (ICO) published guidance on employment records in terms of record retention: ***https://tinyurl.com/ICO-guide***

All staff:

- receive information about SCG's safeguarding arrangements, the provision safeguarding statement, staff behaviour policy (code of conduct), child protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy/deputies and KCSIE 2024 guidance (Part 1 and Annex B), to be provided to all staff particularly at the point of induction;
- receive safeguarding and child protection training at induction, which is regularly updated, and receive safeguarding and child protection updates as required (but at least annually);
- are trained in and receive regular updates in online safety and reporting concerns;
- maintain a zero-tolerance approach to sexual violence and sexual harassment;
- have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse; and are
- given a copy of ***Part 1 and Annex A of Keeping Children Safe in Education 2025*** and will sign to say they have read and understood it (this applies to the Management in relation to Part 2 of the same guidance).

The Child Protection and Safeguarding Policy is made available via the website and parents/carers are made aware of this policy.

All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures.

The names of the designated members of staff for child protection, the DSL and DDSL(s), are clearly advertised in the provision with a statement explaining their role in referring and monitoring cases of suspected harm and abuse.

ROLES & RESPONSIBILITIES

ALL STAFF

All SCG staff have a key role to play in identifying concerns early and in providing help for children, promoting their welfare and actively preventing concerns from escalating.

To achieve this, staff will:

- know who the DSL is, how to contact them and who to approach if the DSL is unavailable (this information is shared in training and through the SCG safeguarding video);
- provide a safe, nurturing and trauma informed environment in which children can learn;
- establish and maintain an environment where children feel secure, are encouraged to talk and are actively listened to;
- ensure children know that there are adults in the provisions who they can approach if they are worried or have concerns about themself or others;
- be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation;
- ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one;
- take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Child Protection & Safeguarding Policy;
- plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe;
- attend training in order to be aware of and alert to the signs of abuse and neglect;
- maintain an attitude of “It could happen here” with regards to safeguarding;
- understand that safeguarding and promoting the welfare of children is “everyone’s responsibility”;

- know how to respond to a child who discloses harm or abuse following training of 'Working together to Safeguard Children', and 'What to do if you are worried a child is being Abused' (2015);
- record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL (DDSL) or safeguarding officer must be informed. Concern forms should be completed straight away and at the latest by the end of the day;
- be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or DDLS is not available;
- report low-level concerns (as defined in KCSIE 2025) about any member of staff/supply staff or contractor to the DSL or DDSL and, where a low-level concern is raised about the DSL, it will be shared with the Director;
- follow procedures set out by guidance issued by the DfE to safeguard children;
- provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan;
- treat information with confidentiality but never promise to "keep a secret";
- notify the DSL or DDSL of any child on a child protection plan or child in need plan who has unexplained absence(s);
- understand Early Help and be prepared to identify and support children who may benefit from Early Help;
- identify children who may benefit from Early Help, liaising with the DSL in the first instance (it may be appropriate for a member of provision staff to act as the lead professional in Early Help cases);
- liaise with other agencies that support children and provide Early Help;
- have an awareness of the role of the DSL, the provision's Child Protection and Safeguarding Policy, Behaviour Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education;
- be mindful that the Teachers' Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties; and

- assist the Management in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

PROVISION OF EARLY HELP

Intervening early to support a child is crucial but, in particular, SCG staff should be alert to the possible need for early help for a child who according to KSCIE 2025:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision such as ours, or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and other drugs themselves;
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage; and/or
- is a privately fostered child.

SCG MANAGERS

In addition to the role and responsibilities of all staff, **the Managers will ensure:**

- the provision fully contributes to inter-agency working in line with ***Working Together to Safeguard Children 2023*** guidance;

- the Child Protection and Safeguarding Policy is implemented and followed by all staff;
- the provision has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place;
- the provision staff have appropriate knowledge of Part 5 of the government's KCSIE guidance;
- all children are supported to report concerns about harmful sexual behaviour freely;
- that concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case, and that comprehensive records of all allegations are kept;
- all SCG staff are made aware of the Lucy Faithfull Foundation Harmful Sexual Behaviour toolkit, ***What is Harmful Sexual Behaviour*** (HSB), which provides information, advice and guidance on HSB prevention, links to organisations and helplines, resources about HSB by children, internet safety, sexual development, and preventing child sexual abuse;
- all SCG learners are aware of ***Shore Space***, the Lucy Faithfull Foundation's confidential chat service that offers support and advice to young people who are concerned about their own or someone else's sexual thoughts and behaviours. Other organisations offering information, advice and guidance on HSB are ***NSPCC Learning*** (HSB or child-on-child sexual abuse), and ***Stop It Now***, a Lucy Faithfull Foundation support helpline for professionals and adults;
- all staff are aware of the role of the DSL, as well as the identity of the DSL, and any DDSLs and safeguarding officers;
- sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, ensuring the contribution to the assessment of children alongside including the provision of advice and support to staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so;
- the DDSLs are trained to the same standard as the DSL and the role is explicit in their job description;
- adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities;
- opportunities are provided for a co-ordinated offer of Early Help when additional needs of children are identified;

- where there is a safeguarding concern that the child's wishes, and feelings are taken into account when determining what action to take and what services to provide;
- child-centred systems and processes are in place for children to express their views and give feedback;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures;
- children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- that allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE, Safeguarding Children Partnership; and
- that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child, or if the person otherwise poses a risk of harm to a child.

In the event that a perpetrator is to be excluded, SCG staff will refer to ***School suspensions and permanent exclusions (https://tinyurl.com/exclusion-gov-guide)*** government guidance to ensure that the decision was lawful, reasonable and fair.

THE DESIGNATED SAFEGUARDING LEAD

In addition to the role and responsibilities of all staff, **the DSL will:**

- hold the lead responsibility for safeguarding and child protection (including online safety) in the provision, this responsibility is not able to be delegated;
- have an "It could happen here" approach to safeguarding;
- liaise with the local authority and work in partnership with other agencies in line with ***Working Together to Safeguard Children***;
- report concerns that a child may be at risk of radicalisation or involvement in terrorism, using the Prevent referral form to refer cases by e-mail to ***preventreferrals@surrey.pnn.police.uk***. If the matter is urgent then Police must be contacted by dialling **999**. In cases where further advice from the Police is sought, dial **101** or **01483 632982** and ask to speak to the Prevent Supervisor for Surrey. The DfE's dedicated telephone helpline for staff and Management Committee to raise concerns around Prevent is **020 7340 7264**;
- refer cases where a crime may have been committed to the Police as required (*NB:* ***NPCC When to Call the Police*** *should help DSLs understand when they should consider calling the Police and what to expect when they do.)*;

- liaise with the "Case Manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required;
- record "low level concerns" in cases which concern a member of staff/supply staff/ contractor or a volunteer - the record should include details of the concern, the context in which the concern arose, the name of the individual sharing their concerns (if the individual wishes to remain anonymous then that will be respected as far as reasonably possible), and action taken;
- follow DfE and KCSIE guidance on 'Peer-on-Peer/Child-on-Child Abuse' when a concern is raised that there is an allegation of a child abusing another child within the provision;
- follow KCSIE and DfE guidance contained in Part 5: Child-on-Child Sexual Violence and Sexual Harassment (2024) and be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required;
- when there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required;
- be available during term time (during provision hours) for staff in provision to discuss any safeguarding concerns - appropriate and adequate cover arrangements will be arranged by the DSL and the leadership for any out of hours/term activities;
- act as a source of support and expertise in carrying out safeguarding duties for the whole SCG community;
- encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff;
- access training and support to ensure they have the knowledge and skills required to carry out the role - DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually;
- have a secure working knowledge of procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements;
- have a clear understanding of access and referral to the local Early Help offer and will support and advise members of staff where early help intervention is appropriate;
- understand and support the provision delivery with regards to the requirements of

the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation;

- be alert to the specific needs of children in need, children with Special Educational Needs and Disability (SEND) and young carers;
- understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at school/alternative provision, particularly the additional risks that children with SEND face online and the associated and appropriate support they require;
- keep detailed, accurate records (either written or using appropriate secure online software) that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken;
- ensure that an indication of the existence of the additional child protection file is marked on the child's school file record;
- ensure that when a child transfers school (including in-year), their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main child's file and ensuring secure transit) and that confirmation of receipt is received;
- ensure that where a child transfers to a school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed;
- ensure proper consideration is given to a multi-agency schools transition meeting if a child transfer case is complex or on-going, and if the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt;
- ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multiagency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so;
- ensure that in meetings, where a report is required, this is shared with the parents prior to the meeting, and that any significant issues are reported to the Manager, such as multi-agency escalation procedures, enquiries under section 47 of the Children Act 1989 and Police investigations;
- ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation;
- ensure that all staff sign to say they have read, understood, and agree to work within the child protection policy, staff behaviour policy (code of conduct) and KCSIE Part 1 and annex A and ensure that the policies are used effectively;

- organise child protection and safeguarding induction, regularly updated training and annual updates at a minimum (including online safety) for all school staff, keep a record of attendance and address any absences;
- ensure that in collaboration with the leadership and management, the child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly;
- ensure that the Child Protection and Safeguarding Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of SCG in this;
- establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements;
- ensure that the names of the DSL and DDSL(s) are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse; and
- meet all other responsibilities as set out for DSLs in KCSIE 2025 and in the SCG DSL and DDSL job description.

THE DEPUTY DESIGNATED SAFEGUARDING LEAD(S)

In addition to the role and responsibilities of all staff, **the Deputy DSLs will:**

- be trained to the same standard as the DSL and as explicitly stated in their job description;
- provide support and capacity to the DSL in carrying out delegated activities of the DSL (note that the lead responsibility of the DSL cannot be delegated); and
- in the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children (in the event of the long-term absence of the DSL the deputy will assume all the functions of the DSL).

THE SENIOR LEADERSHIP TEAM (SLT)

All members of the SLT understand and fulfil their responsibilities, ensuring:

- there is a standardised and unified whole provision approach to safeguarding;
- SCG has effective safeguarding policies and procedure, including this Child Protection and Safeguarding Policy, a Staff Behaviour Policy, Codes of Conduct for staff and learners, a Relationships/Behaviour Policy, and a response to children who go missing from education;
- policies are consistent with statutory requirements, are reviewed annually and that the Child Protection policy is available on the website;
- SCG operates a safer recruitment procedure that includes statutory checks on staff

suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training;

- at least 1 members of the SLT have completed safer recruitment training;
- LA is informed in line with local requirements about the discharge of duties via the annual safeguarding audit;
- staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE 2025 Part 1 and Annex B, and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance;
- all staff including temporary staff/supply staff, volunteers and contractors are provided with SCG's Child Protection and Safeguarding Policy and, if applicable, the Staff Behaviour Policy/Code of Conduct;
- SCG has procedures in place for dealing with allegations of abuse against staff (including the Manager or Director), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned;
- policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or "low level concerns" as defined in KCSIE 2025;
- that on appointment, the DSL and DDSL(s) undertake interagency training (SSCP Foundation Modules 1 & 2) and also initially undertake DSL 'New to Role' with 'Refresher' training every 2 years, as well as completing online training and attending DSL network events, to refresh knowledge and skills;
- children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through Personal, Social, Health and Economic Education (PSHE) and Relationships Education in our SC Mini (primary) provisions, and Relationships and Sex Education (RSE) and Health Education in our secondary and post-16 provisions. Due regard will be paid to the July 2025 statutory guidance on ***Relationships Education, Relationships and Sex Education (RSE) and Health Education*** (to come into effect in 1st September 2026) in the teaching of this subject area.
- SCG application filters and monitoring systems are in place to safeguard children online; utilising the DfE's ***Plan Technology for your School*** Guidance. SCG complies with DfE and the County Council Children Missing Education requirements;

- clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems;
- enhanced DBS checks are in place for all members of the SCG Senior Leadership Team (SLT);
- any weaknesses in safeguarding are remedied immediately; and
- all matters relating to child protection will be treated as confidential and only shared as per the ***Information Sharing: Advice for Safeguarding Practitioners*** (DfE, 2024) guidance.

DATA PROTECTION

SCG provisions will refer to the guidance in the Data protection toolkit for schools to support with data protection activity, **including compliance with General Data Protection Regulation (GDPR)**. The Data Protection Act 2018 and the UK GDPR requires personal information to be processed fairly and lawfully and to keep the information held safely and securely. SCG in accordance with the ICO will comply with the above to prevent personal data breeches.

- Information will be shared with staff within the provision on a "'need to know'" basis.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and the UK GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm.
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- All staff must be aware that they must not promise a child to keep secrets which might compromise the child's safety or wellbeing.
- Where appropriate, SCG staff will always undertake to gain parents/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

For further guidance, please refer to the DfE ***Data protection Guidance for Schools***.

CHILD PROTECTION PROCEDURES

The following procedures apply to all SCG staff working in the provision and will be covered by induction and annual training to enable staff to understand their role and responsibility. The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child.

Where there is a conflict of interest between the child and an adult, the interests of the child must be prioritised. All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

IF A MEMBER OF STAFF SUSPECTS ABUSE, SPOTS SIGNS OR INDICATORS OF ABUSE, OR THEY HAVE A DISCLOSURE OF ABUSE MADE TO THEM THEY MUST:

1. Make an initial record of the information related to the concern.
2. Report it immediately to the DSL, or the DDSL in their absence, and also inform the respective Safeguarding Officer.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
   - dates and times of their observations;
   - dates and times of any discussions in which they were involved;
   - any injuries;
   - explanations given by the child/adult;
   - rationale for decision making and action taken;
   - any actual words or phrases used by the child; and
   - the records must be signed and dated by the author/or equivalent on electronic based records and handed to the DSL.

The DSL in all instances regarding safeguarding should be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

In the absence of the DSL or DDSL(s), staff must be prepared to refer directly to the Police, if appropriate, if there is the potential for immediate significant harm.

FOLLOWING A REPORT OF CONCERNS THE DSL MUST:

- use the LA Levels of Need to decide whether there are sufficient grounds for suspecting harm, in which case a request for support must be made to the Police if it is appropriate;
- discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral, though this should only be done when it will not place the child at increased risk or could impede a Police investigation;
- the child's views should also be considered;
- if there are grounds to suspect a child is suffering, or is likely to suffer harm or abuse, the DSL **must** seek support by making telephone contact with the C-SPA and sending a Request for Support Form by secure email to the LA;
- **if a child is in immediate danger, and urgent protective action is required, the Police (dial 999) must be called;**
- notify the LA of the occurrence and what action has been taken;
- phone to discuss concerns, if they feel unsure about whether a referral is necessary;
- if there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help;
- where there are doubts or reservations about involving the child's family, the DSL should clarify with the LA or the Police whether the parents should be told about the referral and, if so, when and by whom (this is important in cases where the Police may need to conduct a criminal investigation); and
- when a child needs urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the LA – and the DSL should seek advice about what action they will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a mandatory requirement for staff to report directly to the Police. The DSL should also be made aware.

DEALING WITH DISCLOSURES

All SCG staff must:

- actively listen to the child or young person without prejudice or judgement and try to reassure them;
- never promise complete confidentiality and must explain that they need to pass information to other professionals to help keep the child and/or other children safe (the degree of confidentiality should always be governed by the need to protect the child); and
- consider the needs of the child in relation to any SEN, especially those with speech and communication difficulties and for those whose preferred language is not English.

It is important to communicate with them in a way that is appropriate to their age, understanding and preference. If unsure, staff should consult with SCG's SENDCo who is also the DSL for guidance.

All staff should have the right to make a referral to the LA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the premises at the time and have concerns about sending a child home.

GUIDING PRINCIPLES: THE R'S

RECEIVE	- Listen to what is being said, without displaying shock or disbelief - Accept what is said and take it seriously - Make a note of what has been said, and any observations made as soon as practicable (staff will always receive cover to do this)
REASSURE	- Reassure the child, but only so far as is honest and reliable - Do not make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential' - Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', and 'We are going to do something together to get help'

RESPOND	- Respond to the child only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details - Do not ask 'leading' questions i.e., 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court - Do not ask the child why something has happened - Do not criticise the alleged perpetrator; the child may care about him/her, and reconciliation may be possible - Do not ask the child to repeat it all for another member of staff - Explain what you have to do next and whom you have to talk to and reassure the child that it will be a senior member of staff
REPORT	- Share concerns with the DSL immediately - If you are not able to contact your DSL or DDSL(s), and the child is at risk of immediate harm, contact the LA or Police, as appropriate directly - If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration (Your opinion will always be listened to. If a staff member remains dissatisfied with the level of response, they can escalate to the Director, Senior Consultant or to the C-SPA directly.)
RECORD	- If possible, make some very brief notes at the time, and write them up as soon as possible - Keep your original notes on file - Record the date, time, place, person(s) present and noticeable nonverbal behaviour, and the words used by the child, and if the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words - If appropriate, complete a body map to indicate the position of any noticeable bruising - Record facts and observable things, rather than your 'interpretations' or 'assumptions'

	- Support the child: listen, reassure, and be available - Complete confidentiality is essential; share your knowledge only with appropriate professional colleagues - Get some support for yourself if you need it
REVIEW (Led by DSL)	- Has the action taken provided good outcomes for the child? - Did the procedure work? - Were any deficiencies or weaknesses identified in the procedure? Have these been remedied? - Is further training required? What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out. If they have concerns that the disclosure has not been acted upon appropriately, they might inform the Director or Consultant of the provision and/or may contact the C-SPA directly if they still feel dissatisfied.

Receiving a disclosure can be upsetting for the member of staff and SCG operate a regular supervision schedule as well as an on-demand service for staff. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately. In some cases, additional support might be needed, and staff are encouraged to recognise that disclosures can have an impact on their own emotions. Provision managers can direct staff to services that may be able to support them.

CHILD-ON-CHILD ABUSE

Child-on-child abuse can take many numbers of forms.

BULLYING

SCG recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

ANTI-BULLYING / CYBERBULLYING

SCG's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. We keep a record of known bullying incidents, which is shared with and analysed by the Senior Leadership Team.

PSHE and SMSC education regularly provides opportunities for children to understand bullying is wrong, it's impact and how to deal with it.

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that the perpetrator is also given appropriate support and guidance and that staff work in collaboration with safeguarding partners including social care and the police to ensure that the correct level of support is obtained without impeding any investigations that need to take place. Children and young people should be made aware that the law is there to protect them and not to criminalise them. It must also be recognised that other children, adults, and staff are supported and protected as appropriate.

At SCG, we minimise the risk of child-on-child abuse by:

PREVENTION	- Taking a whole staff approach to safeguarding and child protection - Providing training to staff - Providing a clear set of values and standards, underpinned by the provision's behaviour policy and by a planned programme of evidence-based content delivered through the provision - Engaging with specialist support and interventions
RESPONDING TO REPORTS OF SEXUAL VIOLENCE AND SEXUAL HARASSMENT	Children making any report of sexual violence or sexual harassment including "upskirting" (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported. If the report includes an online element, staff will be mindful of the ***Searching, Screening and Confiscation: Advice for Schools 2022*** guidance.
STAFF TAKING THE REPORT WILL	- Inform the DSL or DDSL(s) immediately - Never promise confidentiality

Again, Parents or guardians should usually be informed (unless this would put the child at greater risk). If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the LA securely, as appropriate. The DSL must also consider intra-familial harms, and any necessary support for siblings following incidents.

RISK ASSESSMENT

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider:

1. The victim, especially their protection and support.
2. The alleged perpetrator, their support needs, and any required action.
3. All other students at the provision.
4. The victim and the alleged perpetrator sharing classes and space at the provision.

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the approach to supporting and protecting children. Support regarding risk assessments will be sought from the Education Safeguarding Team where needed.

The DSL will consider:

- the wishes of the victim;
- the nature of the incident including whether a crime has been committed and the harm caused;
- ages of the children involved;
- developmental stages of the children;
- any power imbalance between the children;
- any previous incidents;
- ongoing risks; and
- other related issues or wider context.

OUTCOMES OF CHILD-ON-CHILD ABUSE INCIDENTS

The DSL will consider each case individually and where appropriate seek support from the C-SPA. **Each case will have one of the following outcomes:**

- Manage internally, including extensive support for the perpetrator and victim.
- Early Help intervention.
- Request for support to the LA.
- Report to the Police (generally in parallel with a request for support to the LA).

ONGOING RESPONSE

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim. The DSL will consider how best to keep the victim and perpetrator at a reasonable distance apart on premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, SCG will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same provision would seriously harm the education or welfare of the victim (and potentially themselves and other children).

Where a criminal investigation into sexual assault leads to a conviction or caution, the SLT will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at SCG, the mangers should continue keeping the victim and perpetrator separate and where possible attending different parts of the provision. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.

SCG will take any disciplinary action against the alleged perpetrator in accordance with the Behaviour Policy. SCG recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

PHYSICAL ABUSE

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children-to-children can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, it will be reported to the Police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

ONLINE SAFETY / CYBERCRIME

SCG has an online safety policy that explains how we try to keep children safe in and across our provisions and how we respond to online safety incidents. Children and young people increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites, such as Facebook, X (formerly Twitter), Instagram, Snapchat, Discord, and for online gaming. Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour involving webcam photography or face-to-face meetings.

Children may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. Being safe in the online environment is essential for students – it empowers them to keep themselves safe. Students at SCG are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), will consider a referral into the Cyber Choices programme. This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

INFORMATION SECURITY & ACCESS MANAGEMENT

SCG recognises our responsibility in ensuring our settings have security protection procedures in place of the correct level to safeguard our systems, staff and our learners. SCG will annually review said procedures to remain up to date with emerging cyber-crime technologies. In designing security protection procedures we will follow guidance from the Department's Meeting digital and technology standards in schools and colleges to protect against and build resilience to cyber-attacks. Additionally, we will seek guidance from the National Education Network (NEN) and the National Cyber Security Centre (NCSC) for advice on cyber security training for school staff.

SCG's approach to online safety is based on the four key categories of risk as identified by KCSIE 2025:

CONTENT	being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
CONTACT	being subjected to harmful online interaction with other users, such as child-on-child pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes.
CONDUCT	personal online behaviour that increases the likelihood of/causes harm, such as making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images, and online bullying.
COMMERCE	risks such as online gambling, inappropriate advertising, phishing, and/or financial scams.

We teach students a range of topics, including:

- How to recognise threats online.
- How to recognise inappropriate content and how to behave online – for example, we will cover misogynistic content; self-harm, sexual discrimination, cyberbullying, child-on-child abuse, the dark web, fake news, false advertising, and phishing.
- How to keep personal data safe.
- How to report issues of concern both for themselves and others

RACISM

Our policy on racist incidents is set out separately within the behaviour policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. The DSL keeps a record of all racist incidents.

RADICALISATION, EXTREMISM & TERRORISM

The Prevent Duty for England and Wales (2015) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism. Extremism is defined as 'the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.'

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal, or dangerous. This can happen both online and offline. SCG is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

SCG seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to extreme Islamist ideology, or to Far

Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Provision staff receive training to help identify early signs of radicalisation and extremism. Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and SCG follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social, and cultural education) in Schools (2014).

The DSL will assess the level of risk within the SCG provision and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the provisions profile, community, and philosophy.

When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance. They should then follow the safeguarding procedures and refer cases by e-mail to LA and use the Prevent referral form.

If the matter is urgent then Police must be contacted by dialling **999**. In cases where further advice from the Police is sought dial 101. The Department for Education has also set up a dedicated telephone helpline for staff and Management Committee to raise concerns around Prevent (**020 7340 7264**).

Extremism is defined by the Crown Prosecution Service as the demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs.
- Seek to provoke others to terrorist acts.
- Encourage other serious criminal activity or seek to provoke others to commit serious criminal acts.
- Foster hatred which might lead to inter-community violence in the UK.

As per the prevent guidance, Extremism is defined as: 'the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs'.

There is no such thing as a "typical extremist". Those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those

who hold radical views, do not become involved in violent extremist activity.

Children may become susceptible to radicalisation through a range of social, personal, and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that SCG staff are able to recognise those vulnerabilities.

There are several potential indicators of such vulnerability, which include:

IDENTITY CRISIS	the child is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
PERSONAL CRISIS	the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
PERSONAL CIRCUMSTANCES	migration; local community tensions; and events affecting the child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
UNMET ASPIRATIONS	the child may have perceptions of injustice or a feeling of failure.
EXPERIENCES OF CRIMINALITY	which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
SPECIAL EDUCATIONAL NEEDS AND DISABILITY (SEND)	children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.

- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and/or behaviour.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation solely for the purposes of violent extremism.

DOMESTIC ABUSE

Domestic abuse is actual or threatened psychological, physical, sexual, financial, or emotional abuse. It involves the use of power and coercive control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse. The Domestic Abuse Act 2021 defines domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, through their own intimate relationships and/or if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse, and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act). We use the term domestic abuse to reflect that several abusive and coercive controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other coercive controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse, including where they see, hear or experience its effects are at risk of significant harm and SCG staff are alert to the signs and symptoms of a child suffering or witnessing such abuse.

CHILD EXPLOITATION

There are a number of ways children can be exploited and it is important for SCG staff to be aware of each. Exploitation *'is a situation in which somebody treats somebody else in an unfair way, especially in order to make money [or gain] from their work'* (Oxford Dictionary). With respect to this policy, this power imbalance will be shown through Child Sexual Exploitation and Criminal Exploitation.

CHILD SEXUAL EXPLOITATION (CSE)

CSE 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. ***The Children's Society*** offers educational settings support to prevent child sexual exploitation.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE. Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

SCG is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk. All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the provision and/or can occur between children outside of these environments.

All staff, but especially the DSL and DDSL(s) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms, sexual exploitation, criminal exploitation, and serious youth violence.

The DSL will consider the published LA guidance and advice when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed

that are consistent with a child who is being or who is at risk of being sexually exploited. In all cases if the DSL identifies any level of concern the DSL should contact the LA and email a Request for Support Form.

If a child is in immediate danger the Police should be called on **999**. SCG is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk. SCG includes the risks of sexual exploitation in the PSHE and RSE curriculum.

Children will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

CHILD CRIMINAL EXPLOITATION (CCE) & GANGS

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. There are a number of areas in which children are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual, and emotional abuse or neglect.

Children can be vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues. A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual, and emotional abuse. Girls may be particularly at risk of sexual exploitation. Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL.

SCG is aware there is a clear link between regular non-attendance at placement and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance and make reasonable enquiries with the child and parents to assess this risk.

A request for support to the LA will be made when any concern of harm to a child as a consequence of gang activity, including child criminal exploitation, becomes known. The DSL will contact the LA. If there is concern about a child's immediate safety, the Police will be contacted on **999**.

SHARING NUDES, SEMI-NUDES & YOUTH PRODUCED SEXUAL IMAGERY

The practice of children sharing images and videos via text message, email, social media, or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Sharing Nudes/Semi-Nudes or Youth Produced Sexual Imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18, or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance - ***'Sharing Nudes and Semi-Nudes: Advice for education settings working with children and young people'***.

Cases where sexual imagery of people under 18 has been shared by adults, and where sexual imagery of a person of any age has been shared by an adult to a child, is child sexual abuse and must be reported and responded to as such.

If a member of staff becomes aware of an incident involving making or sharing nudes/semi-nudes, they should follow the child protection procedures and refer to the DSL immediately. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy, or print the images. The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the child/children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a child has been harmed or is at risk of harm a request for support should be made to the LA and/or the Police as appropriate.

Immediate request for support at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to SEND).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to children involved and may decide, with input from the Senior Leadership Team, to respond to the incident without referral to the C-SPA or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.

- The situation is isolated or if the image has been more widely distributed.
- There are other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced sexual imagery previously.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the LA or the Police. The DSL will record all incidents of making, sharing, and sending nudes and semi-nudes including the actions taken, rationale for actions, and the outcome.

FEMALE GENITAL MUTILATION (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the Police. The duty applies to all persons in SCG who are employed or engaged to carry out 'teaching work' in the provision, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed. If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 the teacher should personally make a report to the Police force in which the girl resides by calling 101.

The report should be made immediately. SCG staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the school's child protection procedures.

Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday. There should also be consideration of potential risk to other girls in the family and the wider community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police, including dialling **999** if appropriate. There are no circumstances in which a teacher or other member of staff should examine a girl.

FORCED MARRIAGE

A forced marriage is a marriage in which one or both people do not or (in cases of people with learning disabilities) cannot consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse. Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights.

Since June 2014, forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the LA and/or the Forced Marriage Unit by dialling **020 7008 0151**.

HONOUR-BASED ABUSE

Honour-based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

HBA may be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion.
- Want to get out of an arranged marriage.
- Want to get out of a forced marriage.
- Wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

ONE CHANCE RULE

All staff are aware of the 'One Chance Rule' in relation to forced marriage, FGM and HBA. SCG staff must recognise they may only have one chance to speak to a child who is a potential victim and have just one chance to save a life.

The provision is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

PRIVATE FOSTERING ARRANGEMENTS

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old, or 18 years old if the child is disabled. Looked After Children by the local authority or those who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures and children may be privately fostered at any age.

SCG recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, when a member of staff becomes aware that a child may be in a private fostering arrangement, they must raise this with the DSL and the DSL will notify the C-SPA immediately.

LOOKED AFTER CHILDREN

The most common reason for children becoming looked after is because of abuse and neglect. SCG will ensure that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff will have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The DSL holds details of the child's social worker, carer and the name and contact details of their respective Head of Virtual School, whose role it is to track, monitor, and promote the educational achievement of looked after children, previously looked after children, those with a social worker and those in kinship care.

CHILDREN MISSING EDUCATION

All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have. The provision recognises that children missing education, can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment, or training (NEET) later in life.

Where possible the SCG will:

- Monitor each child's attendance through their daily register.
- Seek guidance from the statutory document ***Working together to Improve School Attendance*** (applies from 19 August 2024); working collaboratively with the respective local authority children's services in cases of persistent unauthorised absence that signals a safeguarding concern. In addition, SCG will seek guidance from ***Children Missing Education***, and ***Missing Children and Adults Strategy*** to ensure SCG are carrying out our statutory duty to safeguard our learners.
- Hold more than one emergency contact number for each child.

SCG attendance and behaviour policies and procedures are in place regarding attendance and behaviour. We recognise that absence from the provision and exclusion may be indicators of abuse and neglect, including the exploitation of children.

The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

We will work in partnership with Police and other partners for reporting children that go missing from the site during the day.

RESTRICTIVE PHYSICAL INTERVENTION

We acknowledge that SCG staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that it must always be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained. Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that sometimes touch is appropriate in the context or working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

WHISTLEBLOWING

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the provision's safeguarding arrangements.

If it becomes necessary to consult outside SCG, staff should speak in the first instance, to the Management team or LADO in accordance with the Whistleblowing Policy.

SAFEGUARDING CONCERNS & ALLEGATIONS AGAINST ADULTS WHO WORK WITH CHILDREN

REFERRAL TO THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO) PROCEDURE

This procedure should be used in all cases in which it is alleged a member of SCG staff (including supply staff, volunteer in a school, or another adult who works with children) **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.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.
- Behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children.

In dealing with allegations or concerns against an adult, SCG staff must:

- **Report any concerns about the conduct of any member of staff, volunteer or other adult to the Manger immediately.**
- **If an allegation is made against the Manger, the concerns need to be raised with the Director as soon as possible. If the Director is not available, then the LADO should be contacted directly.**

There may be situations when the Manager or Director will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received, they will contact the LADO (as part of their mandatory duty) on **03001 231650** option 3 LADO or Email: ***LADO@surreycc.gov.uk*** immediately and before taking any action or investigation.

Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to. In liaison with the LADO, the senior leadership will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the provision to seek guidance from local authority colleagues in following procedures set out in Part 4 of KCSIE 2025 and the SSCP procedures.

APPENDIX 1: WHAT IS CHILD ABUSE?

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2023). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, through honour-based violence, forced marriage, or female genital mutilation.

To support the local context, all staff have access to the *Surrey Safeguarding Children Partnership Levels of Need Threshold* document.

WHAT IS ABUSE, NEGLECT & EXPLOITATION?

In accordance with KCSIE 2025, all SCG staff should be aware of the indicators of Abuse, Neglect and Exploitation (ANE). Children can be at risk of harm in this way within and external to the SCG. ANE can take place inside and outside of the school, the home, as well as online. Exercising professional curiosity and being aware of knowing what to look for is crucial for early identification of ANE allowing for early help and intervention to be provided to children who have been identified as in need of help and protection.

It is rare that ANE, and safeguarding issues are standalone events and there can often be a multitude of different issues involved that overlap.

All SCG staff, especially the DSL and DDSL should consider whether children are at risk of ANE in situations occurring outside their families. SCG Staff should be aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse within their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline and SCG staff should be aware of this particularly given the vulnerability of the children that attend SCG.

Children can also abuse other children online, this can take the form of abusive, harassing,

and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

It is necessary for SCG staff to be consistently vigilant to ensure that children are protected from ANE.

ABUSE & NEGLECT

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. SCG staff should also be aware that it can include non-physical ill treatment as well as the significant impact of witnessing ill treatment of others. Particularly the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. They may be abused by an adult or adults, or another child or children.

PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental 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 in isolation.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. Children can be harmed by witnessing someone harming another person – as in domestic

abuse. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later. Emotional abuse is chronic and cumulative and has a long-term impact.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

NEGLECT

Neglect is 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 as a result of maternal substance abuse. The Neglect Risk Assessment Tool is available to provide a more detailed information regarding the assessment of neglect.

Neglect is a lack of care, but poverty and lack of information or adequate services can be contributory factors. Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it may not pose a risk to the child. The duty to safeguard and promote the welfare of children (***What to do if You're Worried a Child is Being Abused***, DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns SCG staff have should be discussed with the DSL.

Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The Neglect Risk Assessment Tool provides staff with a resource to identify and act on concerns regarding neglect.

CHILD-ON-CHILD ABUSE

All staff should be aware that children can abuse each other (child-on-child abuse). **This is most likely to include, but may not be limited to:**

- Bullying (including cyber bullying).
- Physical abuse, kicking, hitting, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence, such as rape, assault by penetration and sexual assault.
- Sexual harassment, such as sexual comments, jokes, and online sexual harassment which may be stand alone or part of a broader pattern of abuse.
- "Upskirting", which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to gain gratification, or cause the victim humiliation, distress or alarm.
- Sexting (also known as youth produced imagery).
- Initiation type violence and rituals.

APPENDIX 2: KEY INDICATORS OF ABUSE OR NEGLECT

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Most harm is produced in low warmth, high criticism homes, not from single incidents.

INDICATORS OF EMOTIONAL ABUSE

DEVELOPMENTAL ISSUES	- Delays in physical, mental, and emotional development - Poor school performance - Speech disorders - Particularly sudden disorders or changes
BEHAVIOUR	- Acceptance of punishment which appears excessive - Over-reaction to mistakes - Continual self-deprecation (*"I'm stupid, ugly, worthless"* etc.) - Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking) - Self-mutilation - Suicide attempts - Drug/solvent abuse - Running away - Compulsive stealing, scavenging - Acting out - Poor trust in significant adults

	- Regressive behaviour – e.g. wetting - Eating disorders - Destructive tendencies - Arriving early at school, leaving late
SOCIAL ISSUES	- Withdrawal from physical contact - Withdrawal from social interaction - Over-compliant behaviour - Insecure, clinging behaviour - Poor social relationships - Extreme fear of new situations - Inappropriate emotional responses to painful situations (*"I deserve this"*) - Fear of parents being contacted - Self-disgust - Low self-esteem - Unusually fearful with adults - Lack of concentration, restlessness, aimlessness - Extremes of passivity or aggression

INDICATORS OF PHYSICAL ABUSE

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. But accidental injuries normally occur on the bony prominences – e.g., knees, shins. Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present. A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of SCG staff.

Indicators of physical abuse/factors that should increase concern:

- Multiple bruising or bruises and scratches (especially on the head and face).
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped).

- Bruises around the neck and behind the ears – the most common abusive injuries are to the head.
- Bruises on the back, chest, buttocks, or on the inside of the thighs.
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle etc.
- Bite marks.
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette etc.
- Scalds with upward splash marks or tide marks.
- Untreated injuries.
- Recurrent injuries or burns.
- Bald patches.

In the context of the provision, it is normal to ask about a noticeable injury. **Concern should raise when:**

- The explanation given does not match the injury.
- The explanation uses words or phrases that do not match the vocabulary of the child (adult words).
- No explanation is forthcoming.
- The child (or the parent/carer) is secretive or evasive.
- The injury is accompanied by allegations of abuse or assault.

INDICATORS OF SEXUAL ABUSE

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs, or activities. Children can also be subject to child sexual exploitation (CSE). Sexual exploitation is regarded as a separate category of sexual abuse. The LA professional guidance provides school staff with information regarding indicators of CSE.

Characteristics of child sexual abuse are usually as follows:

- It is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic.

- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online).
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but it is important to recognise and be alert to the fact that women and other children can commit sexual abuse too.

PHYSICAL INDICATORS

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

BEHAVIOURAL INDICATORS

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Drug/solvent abuse
- Running away
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour, onset of wetting, by day or night; nightmares

- Arriving early at school, leaving late, running away from home
- Suicide attempts
- Self-mutilation
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking, wetting, or bringing out discarded cuddly toys
- Being worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Child-on-Child Abuse, sexual violence and sexual harassment between children in the provision
- Compulsive stealing, scavenging
- Distructive tendencies

The Centre of Expertise for Child Sexual Abuse offers educational settings support, and ***The National Crime Agency's CEOP Education*** team aim to help protect children and young people from online child sexual abuse.

Additional areas for consideration can be found in the ***Part 5: Child-on-Child Sexual Violence and Sexual Harassment*** (KCSIE, 2025). We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children across SCG. We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSIE (2025) and following recommendations from the Child-on-Child Sexual Violence and Sexual Harassment guidance. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

INDICATORS OF NEGLECT

Whilst neglect is the most common form of child abuse it is one of the hardest to prove and signs can be subtle, so vigilance is vital.

PHYSICAL INDICATORS

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty, or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

BEHAVIOURAL INDICATORS

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

APPENDIX 3: PART 3 SAFER RECRUITMENT (KCSIE, 2025)

The following guidance is taken from Part 3 Safer Recruitment of KCSIE 2025.

Part three: Safer recruitment

209. This part of the guidance has four sections providing schools and colleges with the legal requirements '**must** do', what they **should** do, what is considered **best practice** and **important information** about:

i. the recruitment and selection process

ii. pre-appointment and vetting checks, regulated activity and recording of information

iii. other checks that may be necessary for staff, volunteers and others, including the responsibilities on schools and colleges for children in other settings

iv. how to ensure the ongoing safeguarding of children and the legal reporting duties on employers.

Recruitment and selection process

210. This section focuses on ensuring potential applicants are given the right messages about the school and college's commitment to recruit suitable people.

211. It is vital that as part of their whole school or college approach to safeguarding governing bodies and proprietors create a culture that safeguards and promotes the welfare of children in their school or college. As part of this culture, it is important that they adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges.

212. Governing bodies and proprietors should ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training, the substance of which should at a minimum cover the content of this part (Part three) of this guidance.

213. The School Staffing (England) Regulations 2009.[58] and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007.[59] require governing bodies of maintained schools and management committees of pupil referral units (PRUs) to ensure that at least one of the persons who conducts an

[58] The School Staffing (England) Regulations 2009 (legislation.gov.uk) regulation 9.

[59] The Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 (legislation.gov.uk)

interview has completed safer recruitment training. Governing bodies of maintained schools and management committees of PRUs may choose appropriate training and may take advice from the safeguarding partners in doing so.

Advert

214. Schools and colleges should think about including the following information when defining the role (through the job or role description and person specification):

- the skills, abilities, experience, attitude, and behaviours required for the post, and
- the safeguarding requirements, i.e. to what extent will the role involve contact with children and will they be engaging in regulated activity relevant to children. See page 67 for further information about regulated activity.

215. The advert should include:

- the school or college's commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken
- the safeguarding responsibilities of the post as per the job description and personal specification, and
- whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974. The amendments to the ROA 1974 (Exceptions Order 1975, (amended 2013 and 2020)) provide that when applying for certain jobs and activities, certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. The MOJ's guidance on the Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975, provides information about which convictions must be declared during job applications and related exceptions and further information about filtering offences can be found in the DBS filtering guide.

Application forms

216. Where a role involves engaging in regulated activity relevant to children, schools and colleges should include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for

the role if the applicant is barred from engaging in regulated activity relevant to children.[60]

217. Schools and colleges should also provide a copy of the school or college's child protection policy and practices and policy on employment of ex-offenders in the application pack or refer to a link on its website.

218. Schools and colleges should require applicants to provide:

- personal details, current and former names, current address and national insurance number
- details of their present (or last) employment and reason for leaving
- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment
- qualifications, the awarding body and date of award
- details of referees/references (see below for further information), and
- a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

219. Schools and colleges should only accept copies of a curriculum vitae alongside an application form. A curriculum vitae on its own will not provide adequate information.

Shortlisting

220. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK. For example:

- if they have a criminal history
- if they are included on the children's barred list
- if they are prohibited from teaching
- if they are prohibited from taking part in the management of an independent school

[60] Section 7(1)(a) of the SVGA 2006 (Legislation.gov.uk).

- information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted
- if they are known to the police and children's local authority social care
- if they have been disqualified from providing childcare (see paras 268-272), and,
- any relevant overseas information.

221. This information should only be requested from applicants who have been shortlisted. The information should not be requested in the application form to decide who should be shortlisted.

222. Applicants should be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at point of interview.

223. The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.

224. Schools and colleges should:

- ensure that at least two people carry out the shortlisting exercise (it is recommended that those who shortlist carry out the interview for a consistent approach)
- consider any inconsistencies and look for gaps in employment and reasons given for them, and,
- explore all potential concerns.

225. In addition, as part of the shortlisting process schools and colleges should consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks. See Part two - Legislation and the Law for information on data protection and UK GDPR, the Human Rights Act 1998 and the Equality Act 2010.

Employment history and references

226. The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools and colleges should obtain

references before interview, where possible, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.

227. Schools and colleges should:

- not accept open references e.g. to whom it may concern
- not rely on applicants to obtain their reference
- ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect of any disciplinary investigations)
- obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed
- secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer
- always verify any information with the person who provided the reference
- ensure electronic references originate from a legitimate source
- contact referees to clarify content where information is vague or insufficient information is provided
- compare the information on the application form with that in the reference and take up any discrepancies with the candidate
- establish the reason for the candidate leaving their current or most recent post, and,
- ensure any concerns are resolved satisfactorily before appointment is confirmed.

228. When asked to provide references, schools and colleges should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold. They should not include information about concerns/allegations which are unsubstantiated, unfounded, false, or malicious. Further guidance on references, including on the position regarding low-level concerns, is set out in Part four. References are an important part of the recruitment process and should be provided in a timely manner and not hold up proceedings. Any repeated concerns or allegations which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated or malicious should not be included in any reference.

Selection

229. Schools and colleges should use a range of selection techniques to identify the most suitable person for the post. Those interviewing should agree structured questions.

230. These should include:

- finding out what attracted the candidate to the post being applied for and their motivation for working with children
- exploring their skills and asking for examples of experience of working with children which are relevant to the role, and,
- probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.

231. The interviews should be used to explore potential areas of concern and to determine the applicant's suitability to work with children. Areas that may be concerning and lead to further probing include:

- implication that adults and children are equal
- lack of recognition and/or understanding of the vulnerability of children
- inappropriate idealisation of children
- inadequate understanding of appropriate boundaries between adults and children, and,
- indicators of negative safeguarding behaviours.

232. Any information about past disciplinary action or substantiated allegations should be considered in the circumstances of the individual case.

233. Pupils/students should be involved in the recruitment process in a meaningful way. Observing short listed candidates and appropriately supervised interaction with pupils/students is common and recognised as good practice.

234. All information considered in decision making should be clearly recorded along with decisions made.

ii. Pre-appointment vetting checks, regulated activity and recording information

235. This section provides the legal requirements that governing bodies and proprietors need to understand (and which **must** be carried out) when appointing individuals to engage in regulated activity relating to children. It covers the importance of ensuring the correct pre-appointment checks are carried out. These

checks will help identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). These checks should be seen as part of the wider whole school or college safeguarding regime, which will continue following appointment. This section also explains what information schools and colleges **must** record on the single central record.

236. The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions to providers of post 16 Education: 16-19 Academies, Special Post-16 institutions and Independent Training Providers. Some safer recruitment regulations do not apply to these providers and as such some of the "musts" for colleges do not apply to them. These checks are an essential part of safeguarding, carried out to help employers check the suitability of candidates. Therefore, the providers set out above should carry out these pre-appointment checks. This has been made clear via footnotes.

237. All offers of appointment should be conditional until satisfactory completion of the **mandatory pre-employment checks**. All schools and colleges must:

- verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.[61]
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children).[62] [63] [64] [65] Note that when using the DBS update service, you still need

[61] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should verify the candidate's identity.
[62] 16-19 Academies, Special Post-16 institutions and Independent Training Providers must carry out a DBS check with barred list information as per their funding agreement.
[63] Where the individual will be or is engaging in regulated activity, schools and colleges will need to ensure that they confirm on the DBS application that they have the right to barred list information.
[64] Regulations 12 and 24 of The School Staffing (England) Regulations 2009 for maintained schools also apply to the management committee of pupil referral units through the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007. Part 4 of the Schedule to The Education (Independent School Standards) Regulations 2014 applies to independent schools, including free schools and academies. The Schedule to The Non-Maintained Special Schools (England) Regulations 2015 applies to non-maintained special schools.
[65] Regulation 5 of The Further Education (Providers of Education) (England) Regulations 2006 applies to further education institutions. Further Education providers should also note Regulation 10 of the Further Education (Providers of Education) (England) Regulations 2006, which requires that members of staff (other than agency staff) who move from positions not involving the provision of education into a position involving the provision of education are to be treated as new staff members.

to obtain the original physical certificate (see paragraphs 254-257).[66]

- obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available; See paragraph 266-267 on how to obtain a separate children's barred list check. **This does not apply to 16-19 academies, special post-16 institutions and independent training providers.**[67]
- verify the candidate's mental and physical fitness to carry out their work responsibilities.[68] A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.[69] [70]
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then schools and colleges should follow advice on the GOV.UK website
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate (see paras 285-289) and,
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

In addition:

- independent schools, including academies and free schools, **must** check that a person taking up a management position as described at paragraph 261 is not subject to a section 128 direction made by the Secretary of State
- all schools **must** ensure that an applicant to be employed to carry out teaching work[71] is not subject to a prohibition order issued by the Secretary of State (see paragraph 258) for prohibition checks or any sanction or restriction imposed

---

[66] See the status checking section of the DBS update service employer guide
[67] A separate barred list check is not available to these providers. As such they should not allow an individual to start work in regulated activity until they obtain an enhanced DBS plus barred list check.
[68] Education (Health Standards) (England) Regulations 2003
[69] See legislation.gov.uk section 60 of the Equality Act 2010.
[70] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should - verify the candidate's mental and physical fitness to carry out their work responsibilities, check the person's right to work in the UK; make further checks if the candidate has lived or worked outside the UK and verify professional qualifications where appropriate.
[71] Each of the following activities is teaching work for the purposes of The Teachers' Disciplinary (England) Regulations 2012: planned and preparing lessons and courses for pupils; delivering lessons to pupils; assessing the development, progress and attainment of pupils; and reporting on the development, progress and attainment of pupils.

(that remains current) by the GTCE (see paragraph 260), before its abolition in March 2012

- before employing a person to carry out teaching work in relation to children, colleges **must** [72] take reasonable steps to establish whether that person is subject to a prohibition order issued by the Secretary of State
- all schools and colleges providing childcare[73] **must** ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations. Further details about the application of these arrangements are provided at paragraphs 268-272.

Applicant moving from previous post

238. There is no requirement for a school to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, during a period which ended not more than three months before the person's appointment, the applicant has worked, in a school in England, in a post:

- which brought the person regularly into contact with children, or
- to which the person was appointed on or after 12th May 2006 and which did not bring the person regularly into contact with children or young persons, or
- in another institution within the further education sector in England, or in a 16-19 academy, in a post which involved the provision of education which brought the person regularly into contact with children or young persons.

239. For a college[74] there is no requirement to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, during a period which ended not more than three months before the person's appointment, the applicant has worked in:

- a school in England in a position which brought him or her regularly into contact with persons aged under 18, or

---

[72] Where employing teachers 16-19 Academies, Special Post-16 institutions and Independent Training Providers should contact employer.access.gov.uk to check that the individual is not prohibited from teaching.
[73] Childcare Act 2006 (legislation.gov.uk) section 76(2).
[74] The three-month rule does not apply for 16-19 Academies, Special Post-16 institutions and Independent Training Providers. An enhanced DBS certificate (with barred list information where appropriate) is required.

- another institution within the further education sector in England, or in a 16 to 19 academy, in a position which involved the provision of education and caring for, training, supervising or being solely in charge of persons aged under 18.

240. Whilst there is no requirement to carry out an enhanced DBS check in the circumstances described above, schools or colleges should carefully consider if it would be appropriate to request one, to ensure they have up to date information. Schools and colleges **must** still carry out all other relevant pre-appointment checks (as listed at paragraph 235), including where the individual is engaging in regulated activity with children, a separate children's barred list check (see paragraphs 266-267 on how to carry out a barred list check).

Regulated activity

241. In summary, a person will be engaging in regulated activity with children if, as a result of their work, they:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children
- will be working on a regular basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children, or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Further details on regulated activity below.

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced Factual note on regulated activity in relation to children: scope.

Regulated activity includes:

a. teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b. work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly.[75] Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

c. relevant personal care, or health care provided by or provided under the supervision of a health care professional:
    - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness of disability;[76]
    - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve teaching, training; and
- supervised activity which is paid in non-specified settings such as youth clubs, sports clubs etc.

[75] The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied". Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

Types of DBS checks

242. These are the types of checks available.

- **Basic DBS check** – this provides details of convictions and conditional cautions considered to be 'unspent' under the terms of the Rehabilitation of Offenders Act 1974.
- **Standard DBS check** –this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.
- **Enhanced DBS check** – this provides the same information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) as a Standard DBS check, plus additional information held by the police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed. The position being applied for/or activities being undertaken **must** be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.[77]
- **Enhanced DBS check with children's barred list information** – where people are working or seeking to work in regulated activity relating to children, this allows an additional check, to be made, about whether the person appears on the children's barred list, along with a check of the Police National Computer records plus additional information held by the police as above. The position being applied for, or activities being undertaken, **must** be eligible for an enhanced DBS check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred

---

[76] It is not intended that personal care includes such activities as, for example, parent volunteers helping with costumes for school plays or helping a child lace up football boots.

[77] This legislation does not provide a list of job roles that are eligible for this check – such a list does not exist. Instead, The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 sets out the 'exempted questions' for which a Standard DBS check can be obtained. Similarly, The Police Act 1997 (Criminal Records) Regulations 2002 set out the purposes for which an Enhanced DBS check can be obtained, and The Police Act 1997 (Criminal Records) (No 2) Regulations 2009 list the circumstances in which an application for an Enhanced DBS check can also include suitability information relating to children (a children's barred list check and confirmation as to whether an individual is subject to a s.128 direction). It is important to note that the Regulations can also remove roles, duties or activities through the removal of an exempted question or of a particular purpose. Any individual (including an applicant for a job which does not involve working with children) can be asked to apply for a Basic criminal record check. This will show only unspent convictions and cautions. Further details can be found on gov.uk.

list(s) check. In addition, this check **can** also include information as to whether an individual is subject to a section 128 direction. However, they have to use specific wording in the position applied for field (see paragraph 264).

Considering which type of check is required

243. Most staff in a school and those in colleges working with children will be engaging in regulated activity relating to children, in which case an enhanced DBS check which includes children's barred list information, will be required.

244. For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

245. Barred list information must not be requested on any person who is not engaging in or seeking to engage in regulated activity.

246. The flowchart below (page 71) provides more information on the decision-making process.

247. Where a DBS certificate is required, it must be obtained from the candidate before, or as soon as practicable after, the person's appointment, including when using the DBS update service (see paragraph 254 - 257).

248. Once the checks are complete, the DBS will send a DBS certificate to the applicant. The applicant must show the original paper DBS certificate to their potential employer before they take up post, or as soon as practicable afterwards. Schools and colleges will be able to compare any information disclosed on the certificate with any information shared by the applicant during the recruitment process. DBS guidance on how to check a DBS certificate can be found on GOV.UK.

249. Schools and colleges should assess cases fairly, on an individual basis. A decision not to appoint somebody because of their conviction(s) should be clearly documented, so if challenged the school or college can defend its decision, in line with its policy on the recruitment of ex-offenders.

250. When assessing any disclosure information on a DBS certificate, schools and colleges should take into consideration the explanation from the applicant, including for example:

- the seriousness of any offence and relevance to the post applied for
- how long ago the offence occurred
- whether it was a one-off incident or a history of incidents
- the circumstances around the incident, and,

- whether the individual accepted responsibility for their actions.

251. The school or college should also consider the incident in the context of the Teachers' standards and Teacher misconduct guidance, if the applicant is applying for a teaching post.

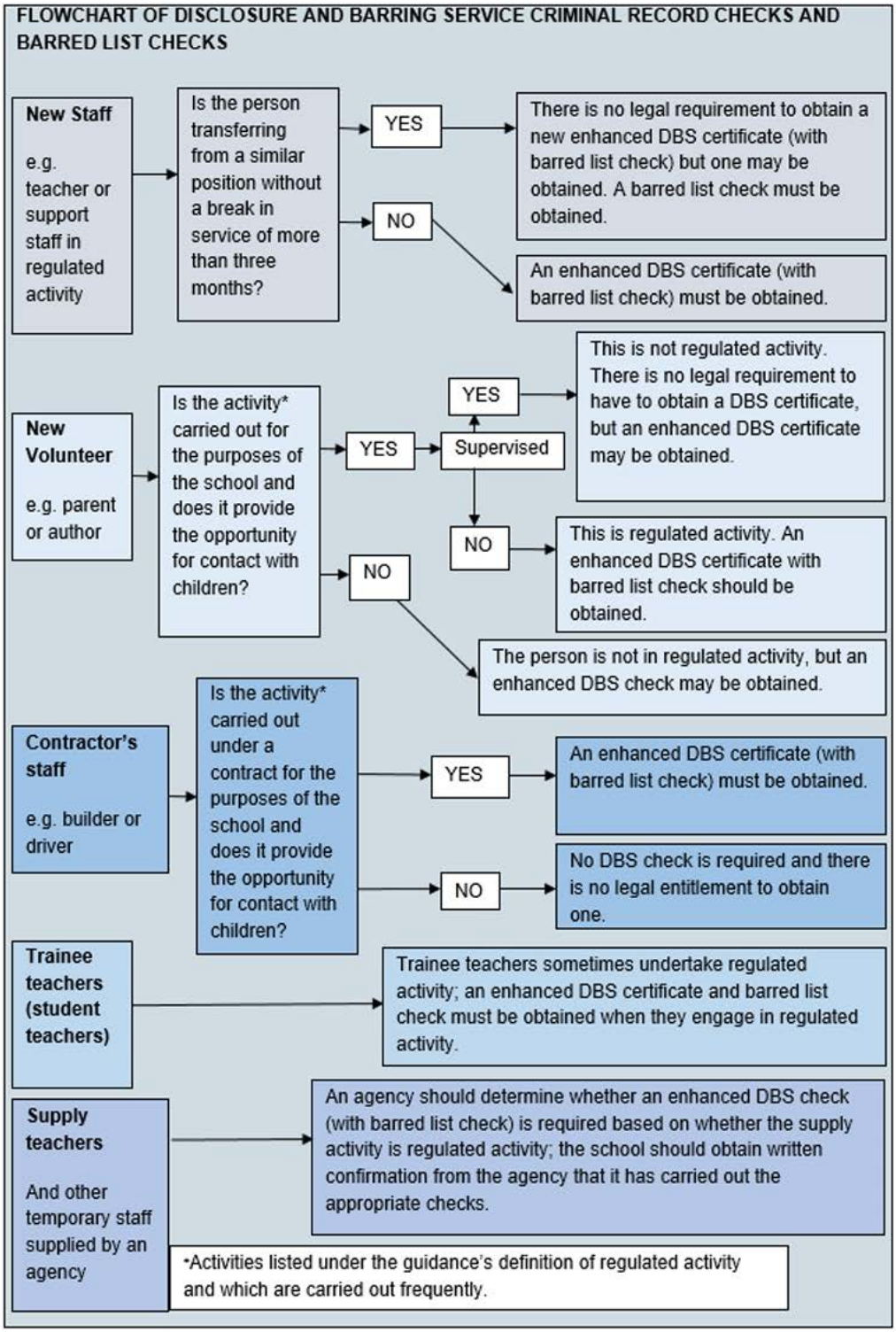
252. Where a school or college allows an individual to start work in regulated activity relating to children before the DBS certificate is available, it should ensure that the individual is appropriately supervised and that they carry out all other checks, including a separate children's barred list check,[78] see paragraphs 266 - 267.

253. Separate barred list checks must only be carried out in the following circumstances:

- for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 235 have been carried out), or
- where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph have been carried out).

[78] 16-19 Academies, Special Post-16 institutions and Independent Training Providers do not have access to standalone barred list check and as such should not allow someone to start work in regulated activity without an enhanced DBS certificate (with barred list information).

Figure 2


FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS
New Staff
e.g. teacher or support staff in regulated activity
Is the person transferring from a similar position without a break in service of more than three months?
YES
There is no legal requirement to obtain a new enhanced DBS certificate (with barred list check) but one may be obtained. A barred list check must be obtained.
NO
An enhanced DBS certificate (with barred list check) must be obtained.
New Volunteer
e.g. parent or author
Is the activity* carried out for the purposes of the school and does it provide the opportunity for contact with children?
YES
Supervised
YES
This is not regulated activity. There is no legal requirement to have to obtain a DBS certificate, but an enhanced DBS certificate may be obtained.
NO
This is regulated activity. An enhanced DBS certificate with barred list check should be obtained.
NO
The person is not in regulated activity, but an enhanced DBS check may be obtained.
Contractor's staff
e.g. builder or driver
Is the activity* carried out under a contract for the purposes of the school and does it provide the opportunity for contact with children?
YES
An enhanced DBS certificate (with barred list check) must be obtained.
NO
No DBS check is required and there is no legal entitlement to obtain one.
Trainee teachers (student teachers)
Trainee teachers sometimes undertake regulated activity; an enhanced DBS certificate and barred list check must be obtained when they engage in regulated activity.
Supply teachers
And other temporary staff supplied by an agency
An agency should determine whether an enhanced DBS check (with barred list check) is required based on whether the supply activity is regulated activity; the school should obtain written confirmation from the agency that it has carried out the appropriate checks.
*Activities listed under the guidance's definition of regulated activity and which are carried out frequently.

DBS Update Service

254. Individuals can join the DBS Update Service[79] at the point that an application for a new DBS check is made. Subscription to the service enables future status checks to be carried out by employers to confirm that no new information has been added to the check since its issue.

255. As good practice, many schools and colleges require new staff to join the Update Service as part of their employment contract. The benefits of joining the Update Service are:

- portability of a DBS check across employers
- free online checks to identify whether there has been any change to the information recorded, since the initial certificate was issued and advice whether the individual should apply for a new DBS check, and,
- that individuals will be able to see a full list of those organisations that have carried out a status check on their account.

256. Before using the Update Service, schools and colleges **must**:

- obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check
- confirm the DBS certificate matches the individual's identity
- examine the original certificate to ensure that it is valid for employment with the children's workforce, and,
- ensure that the level of the check is appropriate to the job they are applying for, e.g. enhanced DBS check/enhanced DBS check including with barred list information.

257. Further information about the Update Service, including when updated information can be used, can be found on GOV.UK.

[79] DBS Update Service - GOV.UK (www.gov.uk) please note there is an annual fee for applicants using the update service.

Prohibitions, directions, sanctions and restrictions

Secretary of State teacher prohibition, and interim prohibition orders[80] [81]

258. Teacher prohibition and interim prohibition orders prevent a person from carrying out teaching work as defined in the Teachers' Disciplinary (England) Regulations 2012 in schools, sixth form colleges, 16-19 academies, relevant youth accommodation and children's homes in England. Further information about the duty to consider referring to the Teaching Regulation Agency (TRA) can be found at paragraph 354-355. Teacher prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by the TRA. Pending such consideration, the Secretary of State may issue an interim prohibition order if it is considered to be in the public interest to do so. The TRA's role in making prohibition orders and the processes used to impose them are described in more detail in the publications "Teacher misconduct: disciplinary procedures for the teaching profession" and "Teacher misconduct: the prohibition of teachers: Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession".

259. A person who is prohibited **must not** be appointed to a role that involves teaching work (as defined in the Teachers' Disciplinary (England) Regulations 2012) (see footnote 71).

Historic General Teaching Council for England (GTCE) sanctions and restrictions

260. There are a number of individuals who are still subject to disciplinary sanctions, which were imposed by the GTCE (prior to its abolition in 2012). See

---

[80] Prohibition orders are made by the Secretary of State under section 141B of the Education Act 2002. The Teachers' Disciplinary (England) Regulations 2012 apply to schools and sixth form colleges and any person that is subject to a prohibition order is prohibited from carrying out teaching work in those establishments. By virtue of their Conditions of Funding in respect of funding received from the Education and Skills Funding Agency, colleges may not employ or engage a person who is subject to a prohibition order to carry out teaching work.

[81] The School Staffing (England) Regulations 2009, the Non-Maintained Special Schools (England) Regulations 2015 and the Education (Independent School Standards) Regulations 2014 require governing bodies or proprietors (of schools and sixth form colleges) to check that a person to be appointed is not subject to an interim prohibition order. By virtue of their Conditions of Funding in respect of funding received from the Education and Skills Funding Agency, before employing a person to carry out teaching work in relation to children, colleges must take reasonable steps to establish whether that person is subject to an interim prohibition order made under section 141B of the Education Act 2002.

paragraph 266-267 for login details to the Check a teacher's record where GTCE checks can be made.

Secretary of State section 128 direction

261. A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools. An individual who is subject to a section 128 direction is unable to:

- take up a management position in an independent school, academy, or in a free school as an employee
- be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school, or
- be a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.

262. There is no exhaustive list of roles that might be regarded as 'management' for the purpose of determining what constitutes management in an independent school. The Department's view is that roles involving, or very likely to involve, management of a school include (but are not limited to) headteachers, principals, deputy/assistant headteachers, governors and trustees. It is important to note that the individual's job title is not the determining factor and whether other individuals such as teachers with additional responsibilities could be considered to be 'taking part in management' depends on the facts of the case.[82]

263. The grounds on which a section 128 direction may be made by the Secretary of State are set out in The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014[83] made under section 128 of the Education and Skills Act 2008.

264. A section 128 direction will be disclosed when an enhanced DBS check with children's barred list information is requested, provided that 'child workforce independent schools' is specified on the application form as the position applied for. Where a person is not eligible for a children's barred list check but will be working in a management position in an independent school, a section 128 check should be carried out using GOV.UK.

---

[82] The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014.
[83] See the 2014 Regulations: https://www.legislation.gov.uk/uksi/2014/1977/regulation/1/made

265. A person subject to a section 128 direction is also disqualified from holding or continuing to hold office as a governor of a maintained school.[84]

How to check DfE, Check a teacher's record for prohibitions, directions, sanctions and restrictions

266. Schools and colleges[85] can use the DfE's Check a teacher's record to make prohibition, direction, restriction, and children's barred list checks. The service is free to use and is available via the DfE's web page. Users will require a DfE Sign-in account to log onto the service.

267. Further information about obtaining a DfE Sign-in account and using Check a teacher's record to carry out a range of 'teacher status checks'[86] including verification of qualified teacher status (QTS) and the completion of teacher induction or teacher probation can be found on GOV.UK.

Childcare disqualification

268. Childcare disqualification is an additional requirement to the general child safeguarding arrangements provided under the Disclosure and Barring Service (DBS) regime, which apply to all children.

269. The childcare disqualification arrangements apply to staff working with young children in childcare settings, including primary schools, nurseries and other registered settings, such as childcare provision on college sites.

270. The arrangements predominantly apply to individuals working with children aged 5 and under, including reception classes, but also apply to those working in wraparound care for children up to the age of 8, such as breakfast clubs and after school care.

271. For staff who work in childcare provision, or who are directly concerned with the management of such provision, employers need to ensure that

---

[84] As barred list information is required to be requested only for those school governors who are engaging in regulated activity, when proposing to recruit a governor who will not work in regulated activity, schools and colleges should use the GOV.UK to check whether the person is barred as a result of being prohibited under s.128.

[85] Where employing teachers 16-19 Academies, Special Post-16 institutions and Independent Training Providers should contact teaching.status@education.gov.uk to check that the individual is not prohibited from teaching. They must also obtain an enhanced DBS with barred list information for those working in regulated activity.

[86] The Check a teacher's record system can also be used to check for the award of qualified teacher status (QTS) and the completion of teacher induction or prohibition.

appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018.

272. Further information on the staff to whom these Regulations apply, the checks that should be carried out, and the recording of those checks can be found in statutory guidance Disqualification under the Childcare Act 2006.

Recording information

Single central record

273. Schools and colleges must [87] maintain a single central record of pre-appointment checks, referred to in the Regulations [88] as "the register" and more commonly known as "the single central record".

274. The single central record must cover the following people:

- **for schools, all** staff, including teacher trainees on salaried routes (see paragraph 300-302), agency and third-party supply staff, even if they work for one day, (see paragraphs 290-293)
- **for colleges**, details of staff, including agency and supply staff providing education to children under the age of 18, and,
- **for independent schools**, all members of the proprietor body. In the case of academies and free schools, this means the members and trustees of the academy trust.

275. The minimum information that **must** be recorded in respect of staff members (including teacher trainees on salaried routes) is set out below. For agency and third-party supply staff, schools and colleges **must** include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the

[87] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should maintain a single central record. Information they should record is set out at paragraphs 271. As with other schools and colleges they may record the information as set out at paragraphs 273.
[88] Regulations 12(7) and 24(7) and Schedule 2 to the School Staffing (England) Regulations 2009 and the School Staffing (England) (Amendment) Regulations 2013 (applied to pupil referral units through the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007);
Part 4 of the Schedule to the Education (Independent School Standards) Regulations 2014;
Regulations 20-25 and the Schedule to the Further Education (Providers of Education) (England) Regulations 2006; and Regulation 3 and paragraph 7 of Part 1 and paragraph 18 of Part 2 of the Schedule to the Non-Maintained Special Schools (England) Regulations 2015.

appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.[89]

276. The single central record **must** indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

- an identity check, (identification checking guidelines can be found on the GOV.UK website)
- a standalone children's barred list check [90]
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- a prohibition from teaching check [91]
- further checks on people who have lived or worked outside the UK (see paragraphs 285-289)
- a check of professional qualifications, where required, and,
- a check to establish the person's right to work in the United Kingdom.

In addition:

- colleges [92] **must** record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18, and
- independent schools (including academies and free schools) **must** record details of the section 128 checks undertaken for those in management positions.

277. The details of an individual should be removed from the single central record once they no longer work at the school or college.

---

[89] Independent schools and non-maintained special schools should also include the date on which any certificate was obtained.
[90] 16-19 Academies, Special Post-16 institutions and Independent Training Providers cannot carry out a separate barred list check and as such, in relation to regulated activity, must always obtain an enhanced DBS with barred list check where required.
[91] There is no requirement for colleges to record this information, however, as part of the funding agreement colleges must have robust record keeping procedures in place.
[92] 16-19 Academies, Special Post-16 institutions and Independent Training Providers are not required to record whether the person's position involves 'relevant activity'. However, these providers should have robust record keeping procedures in place.

Non statutory information

278. Schools and colleges are free to record any other information they deem relevant. For example:

- whether relevant staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements
- checks made on volunteers
- checks made on governors
- dates on which safeguarding and safer recruitment training was undertaken, and
- the name of the person who carried out each check.

279. The single central record can be kept in paper or electronic form.

Multi-academy trusts (MATS)

280. MATs **must** maintain the single central record detailing checks carried out in each academy within the MAT. Whilst there is no requirement for the MAT to maintain an individual record for each academy, the information should be recorded in such a way that allows for details for each individual academy to be provided separately, and without delay, to those entitled to inspect that information, including by inspectors.

Retention of documents

281. Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file as per the advice at paragraph 237.

282. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. To help schools and colleges comply with the requirements of the Data Protection Act 2018, when a school or college chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed a school or college may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to.

283. Schools and colleges do not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record. Further information on handling DBS information can be found on GOV.UK.

iii. Other checks that may be necessary for staff, volunteers and others, including the responsibilities on schools and colleges for children in other settings

284. This section sets out other legal requirements i.e. 'must' do or as appropriate 'should' do for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers; governors and proprietors. It also sets out responsibilities placed on schools and colleges in relation to other settings, including alternative provision, work experience and host families.

Individuals who have lived or worked outside the UK

285. Individuals who have lived or worked outside the UK **must** [93] undergo the same checks as all other staff in schools or colleges (set out in paragraph 235). This includes obtaining (via the applicant) an enhanced DBS certificate (including children's barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools and colleges **must** [94] make any further checks **they think appropriate** so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, schools and colleges should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

These checks **could** include, where available:

- criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter (via the applicant) from the professional regulating authority (this is often the Department/Ministry of Education but varies across the world) in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the Regulated Professions database. Where available, such evidence can be considered together with information obtained through other pre-appointment

[93] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should ensure individuals undergo the same checks.
[94] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should make any further checks

checks to help assess their suitability.

286. Where this information is not available schools and colleges should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

287. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information can be found in DfE Guidance: Recruit teachers from overseas.

288. Not all countries provide criminal record information, and where they do, the nature and detail of the information provided varies from country to country. Schools and colleges should also be mindful that the criteria for disclosing offences in other countries often have a different threshold than those in the UK. The Home Office provides guidance on criminal records checks for overseas applicants which can be found on GOV.UK.

289. Some overseas qualified teachers can apply to the TRA for the award of qualified teacher status (QTS) in England. More information about this is available here. It is important to note that holding a teaching qualification (wherever it was obtained) does not provide suitable assurances for safeguarding purposes that an individual has not been found guilty of any wrongdoing or misconduct, and or is suitable to work with children.

Agency and third-party staff (supply staff)[95]

290. Schools and colleges **must** [96] obtain written notification from any agency, or third party organisation, that they have carried out the same checks as the school or college would otherwise perform on any individual who will be working at the school or college (or who will be providing education on the school or college's behalf, including through online delivery).[97] In respect of the enhanced DBS check,

---

[95] Further advice on safer recruitment for schools and colleges using recruitment and supply agencies can be found within the Better Hiring Institute's Education Supply Chains A better Hiring Toolkit' advice.
[96] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should obtain written notification regarding checks when they use agency or third-party staff.
[97] Colleges must comply with regulations 11 to 19 of The Further Education (Providers of Education) (England) Regulations 2006 in respect of agency workers; maintained schools must comply with regulations 18 and 30 of the School Staffing (England) Regulations 2009; non-maintained special schools must comply with paragraphs 5 and 16 of the Schedule to The Non-Maintained Special Schools (England) Regulations 2015; and independent schools (including academies and free schools) must comply with paragraph 19 of the Schedule to The Education (Independent School Standards) Regulation 2014.

schools and colleges **must** [98] ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.

291. Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school or college, which has disclosed any matter or information, or any information was provided to the employment business, the school or college must [99] obtain a copy of the certificate from the agency.

292. Where the position requires a children's barred list check, this must [100] be obtained by the agency or third party by obtaining an enhanced DBS certificate with children's barred list information, prior to appointing the individual.

293. The school or college should also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

294. Where schools and colleges use contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the school or college.

295. Schools and colleges should ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).

296. For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required.[101] In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across several sites. In cases where the contractor does not have opportunity for regular contact with children,

---

[98] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.
[99] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should obtain a copy of the certificate in such circumstances.
[100] Where using a third party 16-19 Academies, Special Post-16 institutions and Independent Training Providers should ensure a DBS with barred list information is obtained for those engaging in regulated activity.
[101] It will only be possible to obtain an enhanced DBS certificate for contractors in colleges which are exclusively or mainly for the provision of full-time education to children.

schools and colleges should decide on whether a basic DBS disclosure would be appropriate.

297. Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. Schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances.

298. If an individual working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

299. Schools and colleges should always check the identity of contractors on arrival at the school or college.

Trainee/student teachers

300. Where applicants for initial teacher training are salaried by the school or college, the school or college must[102] ensure that all necessary checks are carried out. If these trainee teachers are engaging in regulated activity relating to children (which in most cases by the nature of the work, they will be), an enhanced DBS check (including children's barred list information) must [103] be obtained.

301. Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools and colleges should obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school or college would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.

302. There is no requirement for the school or college to record details of fee-funded trainees on the single central record. However, schools and colleges may wish to record this information under non statutory information, see paragraph 278.

Visitors

303. Schools and colleges have different types of visitors, those with a professional role i.e. educational psychologists, social workers etc. those connected with the building, grounds maintenance, children's relatives or other

[102] 16-19 Academies, Special Post-16 institutions and Independent Training Providers should ensure all necessary checks are carried out.
[103] 16-19 Academies, Special Post-16 institutions and Independent Training Providers must ensure an enhanced DBS check with barred list information is obtained as per their funding agreement.

visitors attending an activity in school such as a sports day. For visitors provided via a third party see paragraphs 290-293.

304. Schools and colleges should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.

305. Headteachers and principals should use their professional judgement about the need to escort or supervise such visitors.

306. For visitors who are there in a professional capacity schools and colleges should check ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks. Schools and colleges should not ask to see the certificate in these circumstances).

307. Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, careful consideration should be given to the suitability of any external organisations.

308. School and college safeguarding policies should set out the arrangements for individuals coming onto their premises, which may include an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

Volunteers

309. Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

310. Whilst volunteers play an important role and are often seen by children as being safe and trustworthy adults, the nature of voluntary roles varies, so schools and colleges should undertake a written risk assessment and use their professional judgement and experience when deciding what checks, if any, are required.

311. The risk assessment should consider:

- the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability, and
- whether the role is eligible for a DBS check, and if it is, the level of the check, for volunteer roles that are not in regulated activity.

312. Details of the risk assessment should be recorded.[104]

When should a DBS with barred list be obtained for volunteers [105]

313. Schools or colleges should obtain an enhanced DBS check (which should include children's barred list information) for all volunteers who are new to working in regulated activity with children, i.e. where they are unsupervised and teach or look after children regularly or provide personal care on a one-off basis in schools and colleges. See Annex E for statutory supervision guidance. Employers are not legally permitted to request barred list information on a supervised volunteer, as they are not considered to be engaging in regulated activity.

Supervision of volunteers

314. It is for schools and colleges to determine whether a volunteer is considered to be supervised. Where an individual is supervised, to help determine the appropriate level of supervision, all schools and colleges[106] **must** have regard to the statutory guidance issued by the Secretary of State (replicated at Annex E).

315. For a person to be considered supervised, the supervision **must** be:

- by a person who is in regulated activity relating to children [107]
- regular and day to day, and
- reasonable in all the circumstances to ensure the protection of children.

Existing volunteers

316. Volunteers do not have to be re-checked if they have already had a DBS check (which should include children's barred list information if engaging in regulated activity). However, if the school or college has any concerns, they should consider obtaining a new DBS check at the level appropriate to the volunteering role.

---

[104] Schools and colleges are free to determine where to store this information.
[105] The DBS does not charge for checks on volunteers. However, if schools or colleges use an external organisation to carry out the check, there may be an administration charge.
[106] This also applies to 16-19 Academies, Special Post-16 institutions and Independent Training Providers
[107] It should be noted that if the work is in a specified place such as a school, paid workers remain in regulated activity even if supervised.

Maintained school governors

317. Governors in maintained schools are required to have an enhanced DBS check.[108] It is the responsibility of the governing body to apply for the certificate for any governors who do not already have one.

318. Governance is not a regulated activity relating to children, so governors do not need a children's barred list check unless, in addition to their governance duties, they also engage in regulated activity.

319. Schools should also carry out a section 128 check for school governors, because a person prevented from participating in the management of an independent school by a section 128 direction, is also disqualified from being a governor of a maintained school. Using GOV.UK schools can check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction. There is no requirement for schools to record this information on the single central record, but they can if they chose to.

320. Associate members are appointed by the governing body to serve on one or more governing body committees. The School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016 which make enhanced DBS checks mandatory for maintained school governors do not apply to associate members, and so there is no requirement for them to be checked unless they also engage in regulated activity at their school.

Sixth form college governors

321. Governing bodies in sixth form colleges can request an enhanced DBS check without a children's barred list check.

322. An enhanced DBS check with children's barred list information should only be requested if the governor will be engaging in regulated activity relating to children.

---

[108] The School Governance (Constitution) (England) Regulations 2012 were amended by the School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016 to include this requirement.

Proprietors of independent schools, including academies and free schools and proprietors of alternative provision academies [109]

323. Before an individual becomes either the proprietor of an independent school or the chair of a body of people which is the proprietor of an independent school, the Secretary of State will:[110] [111]

- carry out an enhanced DBS check; and where such a check is made, obtain an enhanced DBS certificate (either including or not including children's barred list information as appropriate). [112]
- confirm the individual's identity, and
- if the individual lives or has lived outside of the UK, where applying for an enhanced check is insufficient, such other checks as the Secretary of State considers appropriate.

324. The Secretary of State also undertakes these checks in respect of the chair of governing bodies of non-maintained special schools.[113]

325. The requirement for an enhanced DBS check and certificate is disapplied for the chair of an academy trust if the academy is converting from a maintained school and the person has already been subject to a check carried out by the local authority.[114]

326. Where the proprietor is a body of people (including a governing body in an academy or free school), the chair must ensure that enhanced DBS checks are undertaken, for the other members of the body, and that where such a check has been undertaken, an enhanced DBS certificate is obtained, and the chair must ensure that identity checks are completed before, or as soon as practicable after, any individual takes up their position.

327. The chair must also ensure that other members are not subject to a section 128 direction that would prevent them from taking part in the management of an independent school (including academies and free schools).

---

[109] The proprietor of an academy or free school or alternative provision academy or free school is the academy trust.
[110] Paragraph 20 of the Schedule to the Education (Independent Schools Standards) Regulation 2014.
[111] This will include an academy trust of any academy or free school, other than for 16-19 academies or free schools.
[112] Regulation 2(5) of the Education (Independent School Standards) Regulations 2014 sets out when such checks are considered relevant.
[113] Paragraphs 6 and 17 of the Schedule to The Non-Maintained Special Schools (England) Regulations 2015.
[114] Paragraph 20(7) of the Schedule to the Education (Independent School Standards) Regulations 2014.

328. Further checks, as the chair considers appropriate, should be undertaken where, by reason of the individual's living or having lived overseas, obtaining an enhanced DBS check is not sufficient to establish an individual's suitability to work in a school.

329. In the case of an academy trust, including those established to operate a free school, the trust must require enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees.[115] Academy trusts, including those established to run a free school, have the same responsibilities as all independent schools in relation to requesting enhanced DBS checks for permanent and supply staff.[116]

330. Where an academy trust delegates responsibilities to any delegate or committee (including a local governing body), the trust must require an enhanced DBS check on all delegates and all members of such committees.[117] Academy trusts must also check that members are not disqualified from taking part in the management of the school as a result of a section 128 direction.

Alternative provision

331. Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil, (further information provided in part 2). Schools should obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. This includes written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

---

[115] As required in the Academy Trust Handbook which academy trusts must comply with as a condition of their funding agreement.
[116] The Education (Independent School Standards) Regulations 2014. The regulations do not apply to 16-19 free schools and academies.
[117] As required in the Academy Trust Handbook which academy trusts must comply with as a condition of their funding agreement.

Adults who supervise children on work experience

332. Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.[118]

333. Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement.[119] The school or college should consider the specific circumstances of the work experience. Consideration must be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.

334. These considerations would include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:

- unsupervised themselves, and
- providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

335. If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, the school or college could ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.

336. Schools and colleges are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience.[120]

337. If the activity undertaken by the child on work experience takes place in a 'specified place[121], such as a school or sixth form college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity relating to children. In these cases, and where the child doing the work experience is 16 years of age or over, the work experience provider e.g. school or sixth form college should consider whether a DBS enhanced check should be requested for

---

[118] Guidance on work experience.
[119] Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, which came into force on 10 September 2012.
[120] The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 was amended by the Rehabilitation of Offenders Act 1974 (Exceptions) (Amendment) (England and Wales) Order 2012 so that employers may no longer request checks in these circumstances.
[121] See page 8 of DBS guidance: Regulated activity with children England which can be found at: Regulated activity with children in England and Wales - GOV.UK (www.gov.uk)

the child in question. DBS checks cannot be requested for children under the age of 16.[122]

Children staying with host families (homestay)

338. Schools and colleges quite often make arrangements for children receiving education at their institution to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements (see Annex D for further details).

339. In some circumstances the arrangement where children stay with UK families could amount to "private fostering" under the Children Act 1989.

Private fostering – local authority notification when identified

340. Private fostering[123] occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

341. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school and college staff through the normal course of their interaction, and promotion of learning activities, with children.

342. Where the arrangements come to the attention of the school or college (and the school or college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.

DBS Guidance leaflets

[122] Under the Police Act 1997, an individual must be 16 or over to be able to make an application for a DBS check.

[123] Part 9 of the Children Act 1989 (legislation.gov.uk).

343. Comprehensive guidance on private fostering can be found here: Private fostering: local authorities.

iv. How to ensure the ongoing safeguarding of children and the legal reporting duties on employers

344. This section explains the importance of safeguarding vigilance beyond the recruitment process and as part of the whole school or college approach to safeguarding.

345. Safer recruitment is not just about carrying out the right DBS checks. Similarly safeguarding should not be limited to recruitment procedures. Good safeguarding requires a continuing commitment from governing bodies, proprietors, and all staff to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures and consequentially enshrined in its ethos. See Parts one and two of this guidance for information about providing a coordinated whole school and college approach to safeguarding.

Ongoing vigilance for all staff

346. Governing bodies and proprietors should ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

347. To support this, it is important that school and college leaders create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children. As set out in Part one, Part two and Part four of this guidance it is important that all staff understand the process and procedures to follow if they have a safeguarding concern about another staff member. This can assist employers to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care.

Existing staff

348. There are limited circumstances where schools and colleges will need to carry out new checks on existing staff. These are when:

- an individual working at the school or college moves from a post that was not regulated activity with children into work which is considered to be regulated

activity with children. In such circumstances, the relevant checks for that regulated activity **must**[124] be carried out

- there has been a break in service of 12 weeks or more, or
- there are concerns about an individual's suitability to work with children.

349. For colleges, an individual moving from a position that did not involve the provision of education to one that does, **must** be treated as if that individual were a new member of staff and all required pre-appointment checks **must**[125] be carried out (see paragraph 236).

Duty to refer to the Disclosure and Barring Service

350. When an allegation is made (see Part four), an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK.

351. There is a legal requirement for schools and colleges [126] to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

352. The DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS (including what is the harm test and relevant conduct), and what information must be provided, can be found on GOV.UK.

353. Referrals should be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. It is important that as much relevant information is provided to the DBS as possible, as it relies on the quality of information provided by the school or college when considering the referral.

---

[124] This also applies to 16-19 Academies, Special Post-16 institutions and Independent Training Providers.
[125] This also applies to 16-19 Academies, Special Post-16 institutions and Independent Training Providers.
[126] This also applies to 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

Duty to consider referral to the Teaching Regulation Agency

354. Where a school, sixth form college or 16-19 academy teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.

355. The Secretary of State may investigate the case, and if there is a case to answer, must then decide whether to make a prohibition order in respect of the person.[127] Details about how to make a referral to the TRA can be found on GOV.UK.

[127] Sections 141D and 141E of the Education Act 2002 do not apply to colleges (other than sixth form colleges).

APPENDIX 4: KEY CONTACTS

CROYDON

If appropriate, your emails may be directed to the following Croydon contacts:

Email / query about a care experienced child or young person	*virtualschool@croydon.gov.uk*
Email / query about a placement at Croydon Town School	*croydontownschool@croydon.gov.uk*
Email / query about a pupil's attendance or (risk of) exclusion	*exclusions@croydon.gov.uk*
Email / query about a safeguarding concern or incident	*MASHeducation@croydon.gov.uk*
Email / query about a pupil's inclusion or managed move	*secondaryinclusion@croydon.gov.uk*
Email / query about a pupil who is missing from education	*childrenmissingfromeducation@croydon.gov.uk*
Email / query about a pupil who is / will be electively home educated	*ElectiveHomeEducation@croydon.gov.uk*
Email / query about a young person or post 16 provision	*post16@croydon.gov.uk*
Social Care Out of Hours duty workers Please call this number if your query is a safeguarding emergency regarding a young person.	*02087 266 400*

SUTTON

Children's First Contact Service (CFCS)	0208 770 6001	*childrensfirstcontact@sutton.gov.uk*
Social Care - Out of Hours - Emergency Duty Team	0208 770 5000 ext. 9	
Sutton Local Safeguarding Children's Partnership	0208 770 4879	*suttonlscp@sutton.gov.uk* *www.suttonlscp.org.uk*

(Sutton Local Safeguarding Children Board ceased to exist when the new Sutton Local Safeguarding Children Partnership arrangements came into effect on 1 July 2019.

Three Statutory Partners are the Local Authority, Clinical Commissioning Group and Police. Locally, Education providers will be made the fourth Partners.

The LSCP Board will be made up by the four Partners, co-opted members and relevant agencies.)

Sutton LA LADO (Local Authority Designated Officer - Complaints Against Staff)	0208 770 4776	*LADO@sutton.gov.uk*
LBS Prevent & Hate Crime Manager	0208 649 0672	
Education Safeguarding Manager	07736 338180	
Escalation Procedures		*'Sutton LSCP Escalation Policy' (suttonlscp.org.uk)*
Serious Child Incident		*'Sutton LSCP Chid Death Guidance for Education Providers' (suttonlscp.org.uk)*

SURREY CHILDREN'S SERVICES

Children's Single Point of Access (C-SPA)	0300 470 9100	*cspa@surreycc.gov.uk*

During evenings, weekends and bank holidays, the Emergency Duty Team is available at:

	01483 517898	*edt.ssd@surreycc.gov.uk*
Surrey LA LADO	0300 123 1650	*lado@surreycc.gov.uk* Level of need document: *'Effective Family Resilience Surrey' (surreyscp.org.uk)* Request for support form: *'Surrey Children's Services Request for Support Form' (surreyscp.org.uk)*

GENERAL CONTACTS

Police	999
NSPCC	0808 800 5000
NSPCC Whistleblowing Helpline	0800 028 0285
ChildLine	0800 1111

APPENDIX 5: SCG'S STATUTORY DUTY & GUIDANCE DOCUMENTS

This policy sets out how SCG will meet its statutory duty to safeguard and promote the welfare of our students. It has been developed in accordance with the law and guidance found at *www.gov.uk* that seeks to protect children.

Further guidance in relation to the safeguarding topics covered in this policy include:

- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges.
- Working Together to Safeguard Children.
- Multi-agency Statutory Guidance on Female Genital Mutilation.
- Teaching Online Safety in Schools.
- Information About Mandatory Reporting of Female Genital Mutilation.
- Protecting Children from Radicalisation: The Prevent Duty.
- Prevent Duty Guidance: England and Wales.
- Inspecting Safeguarding in Maintained Schools and Academies.
- Inspecting Safeguarding in Early Years, Education and Skills Settings.
- Preventing Youth Violence and Gang Involvement.
- Criminal Exploitation of Children and Vulnerable Adults: County Lines.
- Sexual Offences Act.
- The Children Act 1989 and 2004 and The Education Act 2002.
- Mental Health and Behaviour in Schools: Departmental Advice.
- Multi-Agency Statutory Guidance on Female Genital Mutilation.

- Learning Together to Be Safe - a toolkit to help schools contribute to the prevention of violent extremism.
- The Prevent Strategy: A Guide for Local Partners in England.
- Secondary School Teachers: Useful Information
- *Teachers' Standards*

If anyone wishes to seek further information or guidance, they can refer to the above documents.

APPENDIX 6: RECORD KEEPING DOCUMENTS

SPORTING CHANCES GROUP

ENCOURAGING EXCELLENCE, NURTURING TALENT!

SAFEGUARDING INCIDENT / CONCERN FORM

*Required. + Continue on a seperate sheet if necessary.

Young Person's Full Name*	
Date of Birth* (dd/mm/yy)	
Name & Position of Person Completing Form* (Please print)	
Date & Time of Incident / Concern* (dd/mm/yy, 00:00)	

INCIDENT / CONCERN*+
(Who/what/where/when?)

ANY OTHER RELEVANT INFORMATION+
(E.g., witnesses, immediate action taken...)

Staff Signature*	
Staff Role*	
Date Form Completed* (dd/mm/yy)	

ACTION TAKEN & OUTCOMES*
(Include reasons for the decision.)
NB: This section is only to be completed by DSL.

Deputy DSL Signature*	
Date* (dd/mm/yy)	

Head DSL Signature*	
Date* (dd/mm/yy)	

SPORTING CHANCES GROUP

ENCOURAGING EXCELLENCE, NURTURING TALENT!

STUDENT PROFILE

Young Person's Full Name*		**Also Known As**	
Date of Birth* (dd/mm/yy)			
Home Address*		**Current Address** (if different)	
Contact Number*			

FAMILY MEMBERS*
(I.e., parents/carers/siblings...)

Name	Relationship	Address	School Details

Date File Started* (dd/mm/yy)	

Are records held in school / setting relating to other connected children?*

Yes No

CONTACT DETAILS OF OTHER PROFESSIONALS*

Name	Agency	Address

SPORTING CHANCES GROUP

ENCOURAGING EXCELLENCE, NURTURING TALENT!

SAFEGUARDING CHRONOLOGY

Young Person's Full Name*	
Date of Birth* (dd/mm/yy)	

Date* (dd/mm/yy)	**Incident / Event***	**Signature ***

SPORTING CHANCES GROUP

ENCOURAGING EXCELLENCE, NURTURING TALENT!

RECORD OF ACTIONS / CONTACT

Young Person's Full Name*	

Date & Time* (dd/mm/yy, 00:00)	Details*	Initials*	Signature*