



**The Eliot Bank and Gordonbrock
Schools Federation**



Safeguarding Policy

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1. Safeguarding Statement

Eliot Bank and Gordonbrock Schools Federation recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We will act quickly and follow our procedures to ensure children receive early help and effective support, protection and justice. This policy applies to all staff, governors, professionals and volunteers working in the federation.

Eliot Bank and Gordonbrock Schools Federation recognise that ‘Adultification bias’ is a form of racial prejudice where children of minority groups, typically Black children, are treated by adults as being more mature than they actually are. Actions committed by these children that would be deemed normal for child development are more likely to be treated as opportunities for discipline and children are more likely to be seen as having malicious intentions. A clear example of this bias in action is when a Black child is assumed to be older than their actual age. These perceptions could in turn perpetuate the maturity of Black children and the assumptions of adults can lead to these students experiencing harm and can lead to Black children are not receiving the safeguarding responses they need. This can inadvertently send a clear message in terms of worth and value to children as to who is and is not perceived as worthy of support. This can then impact on how Black children view themselves and what they then identify and understand to be harmful. Ultimately, this type of behaviour normalises harm and feeds into the narrative that Black people can withstand any form of abuse.’ The Federation has signed Lewisham’s pledge to tackle race inequalities in school. We pledge to take actions that will address access and opportunity for all pupils, by highlighting inequalities and increasing awareness.

We commit to:

- Targeting ambitious outcomes for Black Caribbean heritage and Black and Minority Ethnic pupils;
- Reducing exclusions of Black Caribbean heritage pupils of all ages;
- Leaders and governors taking a whole school approach to tackling race inequality;
- Transparent reporting and sharing of borough-wide data trends;
- Working together in new ways and sharing good practice to tackle race inequality in our school cultures and curriculum;
- Actively developing high quality relationships with Black Caribbean heritage and Black and Minority Ethnic pupils and their parents; and
- Improving Black representation in school leadership and governing bodies.

This Safeguarding Policy applies to **all** staff, governors and volunteers working in school.

2. Safeguarding Principles

Our core safeguarding principles are:

- All children have the right to be safeguarded from harm and exploitation whatever their race, religion, first language / ethnicity, gender / sexuality, age, health / disability and political / immigration status.
- We recognise that all staff and governors have a full and active part to play in protecting our pupils from harm, and that child's welfare is our paramount concern.
- All children deserve the opportunity to achieve their full potential and can only do so when they feel safe.
- The needs of the child are paramount and should underpin all child protection work and resolve any conflict of interest.
- All staff have an equal responsibility to identify children who may benefit from early help and to act on any suspicion or disclosure that may suggest a child is at risk of harm.
- There is a culture of transparency, openness and, if needed, challenge concerning maintaining high standards in safeguarding.
- Pupils and staff involved in child protection issues will receive appropriate support

3. Aims

The aims of this policy are:

- To demonstrate the federation's commitment with regard to child protection to pupils, parents and other partners.
- To provide all staff with the necessary information to enable them to meet their child protection responsibilities.
- To ensure consistent good practice including a structured procedure within the federation that will be followed by all of its members in cases of suspected abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the federation, contribute to assessments of need and support plans for those children.
- To develop effective working relationships with all other agencies (including Children's Social Care Services, the police and health services) involved in safeguarding children.
- To ensure that all adults within our federation who have access to children have been checked as to their suitability to work with children.

4. Safeguarding Legislation and Guidance

4.1 Legislation

4.1.1 Education Act 2002

Section 175 of the Education Act 2002 requires local education authorities and the governors of maintained schools and further education (FE) colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children.

4.1.2 Counter Terrorism and Security Act 2015

Section 26 Applies to schools and other providers: to have due regard to the need to prevent people being drawn into terrorism.

4.2 Statutory Guidance

4.2.1 Working Together to Safeguarding Children (2018)

Working Together to Safeguarding Children (2018) covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of Children. It also provides the framework for Local Safeguarding Children Boards (LSCB's) to monitor the effectiveness of local services, including safeguarding arrangements in schools.

4.2.2 Keeping Children Safe in Education (2022)

[Keeping Children Safe in Education \(2022\)](#) ([Appendix 1](#)) is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) (England) Regulations 2014 and the Education (Non Maintained Special Schools) (England) Regulations 2011. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children.

Unless otherwise stated, 'school' in this guidance means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies, pupil referral units and maintained nursery schools. 'College' means further education and sixth form colleges under the further and higher education act 1992 and relates to under 18's, but excludes 16-19 academies and free schools.

All staff working within the federation are required to read Part One of this guidance. Staff can find a copy on notice board in the staffroom as well as in [appendix 1](#) of this policy.

4.2.3 Definitions, Recognising and Responding to Abuse

See [Appendix 2 Definitions, Recognising and Responding to Abuse.](#)

5. Roles and Responsibilities

5.1 The Roles of the Governing Body

All governors and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010²², (including the Public Sector Equality Duty²³), and their local multi-agency safeguarding arrangements.

All governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated.

The Governing Body will ensure that the federation:

- Creates a culture where the welfare of students is paramount and staff feel confident to challenge over any concerns.
- Complies with their duties under legislation - including the Prevent Duty 2015.
- Contributes to interagency working and plans.
- Takes into account Lewisham Safeguarding procedures.
- Has an effective safeguarding policy (updated annually and displayed on the schools' websites) as well as staff behaviour policy or code of conduct and both are provided to and followed by all staff in a timely manner.
- Ensures that the safeguarding policy is made available to parents via the school website.
- Has a governor who is responsible for liaising with the LA and or partner agencies in the event of allegations of abuse being made against the headteacher.
- Appoints a Designated Safeguarding Lead (DSL) who is a member of the senior leadership team, trained every 2 years, and that the responsibilities are explicit in the role holder's job description. The DSL should be given time, funding and training to support this. There should always be cover for this role.
- Appoints a designated Looked After Children (LAC) teacher and ensures appropriate training.
- Ensure staff have awareness of this group and their needs including contact arrangements.
- Has considered how children are taught about safeguarding.
- Has evidence of the child voice and that there are systems in place for feedback and pupils' views.
- Operates safer recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children within the federation.

- Has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures.
- Has an appropriate response to children who go missing from education and inform and report to the Local Authority when required.
- Ensures appropriate online filter and monitoring systems are in place and ensure online safety is included in lessons.
- Develops a training strategy that ensures all staff, including site staff and the Executive Headteacher/Head of School, receive information about the school's safeguarding arrangements on induction and appropriate child protection training, which is regularly updated in line with any requirements.
- Remedy, without delay, any deficiencies or weaknesses regarding child protection arrangements.
- Ensure that where services or activities are provided on the federation's premises by another body, the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the federation on these matters where appropriate.
- Review their policies and procedures annually and provide information to the LA about them and about how the above duties have been discharged.

5.2 The Role of the Executive Headteacher / Head of School

The Executive Headteacher / Head of School will ensure that the federation:

- child protection policy and code of conduct are implemented and followed by all staff.
- ensure that all staff have received 'Section 1' and 'Annexe A' of Keeping Children Safe in Education and have signed to acknowledge they have read and understood its contents.
- ensure that all relevant training for all staff is up-to-date and reviewed annually.
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings.
- enables staff to 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
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- liaises with the Designated Officer/LADO where an allegation is made against a member of staff
- refers anyone who has harmed or may pose a risk to a child to the Disclosure and Barring Service.

5.3 The Role of the Designated Safeguarding Lead (DSL)

The broad areas of responsibility for the designated safeguarding lead are:

5.3.1 Managing Referrals

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

- the local authority designated officer (LADO) for child protection concerns (all cases which concern a staff member);
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child);
- Police (cases where a crime may have been committed); and
- support the staff who are involved in CP cases

5.3.2 Working with Others

- Liaise with the Head of School to inform her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- As required, liaise with the case manager and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member).
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Organise the dissemination of information to the Individual School Safeguarding Team.

5.3.2.1 Resolving Professional Differences / Escalation

If the DSL is not satisfied with the outcomes of a particular agency and judges a child to be at risk, the DSL will follow the Lewisham Children Safeguarding Board's 'Resolving Professional Differences Protocol,' 2018. Having different professional perspectives within safeguarding practice is a sign of a healthy and well-functioning partnership. These differences of opinion are usually resolved by discussion and negotiation between the professionals concerned. It is essential that where differences of opinion arise, they do not adversely affect the outcomes for children and young people, and are resolved in a constructive and timely manner.

5.3.3 Undertaking Training

The DSL (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead will undertake Prevent Awareness Training.

In addition to the formal training set out above, their knowledge and skills will be refreshed through LA briefings at regular intervals to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the federation's child protection policy and procedures, especially new and part time staff.
- Are alert to the specific needs of children in need, those with special educational needs and young carers.
- Are able to keep detailed, accurate, secure written records of concerns and referrals.
- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

5.3.4 Raising Awareness

The DSL should ensure the federation's policies are known and used appropriately to:

- Ensure the federation's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this.
- Link with the local Lewisham Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

5.3.5 Record Keeping

The DSL will ensure that staff keep a record of all concerns in a systematic and clear way. Specific forms have been designed for concerns that require immediate action, concerns that are lower level and ongoing and concerns that involve the use of the internet.

A log of all concerns is kept by the DSL. All records are kept securely and made available to staff on a 'need to know' basis.

5.3.6 Information Sharing of Child Protection File

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. The DSL should ensure a copy of the file is kept for their own records.

In addition to this, the Designated Safeguarding Lead may also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

5.3.7 Availability

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, in exceptional circumstance, contact will be made by phone.

5.3.8 Deputy DSL

The Deputy DSLs are appropriately trained and, in the absence of the designated lead, carry out those functions necessary to ensure the ongoing safety and protection of pupils. However, the senior DSL holds lead responsibility.

6. Staff Training

We are committed to the provision of child protection training for all our staff and governors. Training is in line with Lewisham Safeguarding Children Partnership procedures.

All new staff, visiting teachers, students and volunteer adults will have safeguarding and children protection as part of their initial and ongoing induction.

All staff and governors have annual, in depth, top up training particularly on Child Protection. All staff receive regular updates on safeguarding issues through staff briefings.

7. Establishing an Ethos

We know that through establishing an ethos where:

- all pupils and adults are respected and valued;
- staff give safeguarding the highest importance;
- staff are vigilant;
- staff are prepared to challenge themselves and others to ensure the best outcomes for children;
- staff feel confident to identify misconduct to reliable staff/Governors/Other agencies;
- pupils learn how to stay safe, develop healthy relationships, self-esteem and self-motivation through the curriculum; and
- pupils are well behaved
- we will minimize safeguarding issues such as peer on peer abuse.

8. Safeguarding Areas



Each number in the diagram above refers to a chapter within this policy document.

9. Staff Conduct

We use The Safer Recruitment Consortium document '[Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' - May 2019](#), as the basis for our Code of Conduct.

9.1 Good Practice Guidelines & Staff Code of Conduct ([Appendix 3](#))

To meet and maintain our responsibilities towards pupils we need to agree standards of good practice which form a code of conduct for all staff. Good practice includes:

- treating all pupils with respect;
- being alert to changes in pupils' behaviour and to signs of abuse and neglect;
- recognising that challenging behaviour may be an indicator of abuse;
- setting a good example by conducting ourselves appropriately, including online;
- involving pupils in decisions that affect them;
- encouraging positive, respectful and safe behaviour among pupils including challenging inappropriate or discriminatory language or behaviour;
- avoiding behaviour or language which could be seen as favouring pupils;
- avoiding any behaviour which could lead to suspicions of anything other than a professional relationship with pupils;
- reading and understanding the school's child protection policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, and appropriate IT/social media use;
- asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid (for more information see [Appendix 4, Intimate Care Policy](#))
- maintaining appropriate standards of conversation and interaction with and between pupils, avoiding the use of sexualised or derogatory language, even in joke;
- being clear on professional boundaries and conduct with other staff when pupils present;
- being aware that the personal, family circumstances and lifestyles of some pupils lead to an increased risk of abuse;
- applying the use of reasonable force only as a last resort and in compliance with school procedures;
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly to police or children's social care;
- following the school's rules with regard to communication with pupils and use of social media and online networking;
- avoiding unnecessary time alone with pupils and risk manage any time alone or 1:1 working; and
- avoiding sharing excessive personal information with pupils.

9.2 Abuse of Position of Trust

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

10. Curriculum - Helping Children to Keep Themselves Safe

Children are taught to understand relationships, promote British values and respond to and calculate risk through our Personal, Social, Health and Citizenship Education (PSHCE) and Relationships and Sex Education lessons and in all aspects of school life. See [Appendix 5, Promoting Fundamental British Values as Part of Spiritual, Moral, Social and Cultural Development](#), for more information.

Our approach is designed to help children to think about risks they may encounter and help them to work out how those risks might be overcome. Discussions about relationships and risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about ONLINE Safety, including sexting (age appropriate) and bullying, including the consequences.

The school continually promotes an ethos of respect for children and the emotional health and wellbeing of our students is important to us. Pupils are encouraged to speak to a member of staff in confidence about any worries they may have.

11. Whistleblowing

All staff must remember that the welfare of the child is paramount and staff should feel able to report all concerns, including low level concerns, about a colleague or the safeguarding practice within the school. The school's [Whistleblowing Policy \(Appendix 6\)](#) enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. Staff should also refer to the Staff Code of Conduct for further guidance on low level concerns.

12. Allegations Against Staff

When an allegation is made against a member of staff, set procedures (see [Appendix 7, Local Authority Procedure for Managing Allegations Made Against Adults Who Work With Children](#)) must be followed. It is important to have a culture of openness and transparency and a consultation with the Local Authority Designated Officer will happen if staff have:

- behaved in a way which has harmed, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they would pose a risk of harm to children.

Allegations against staff should be reported to the Executive Headteacher or Head of School. Allegations against the Executive Headteacher should be reported to the Chair of Governors.

Staff may also report their concerns directly to the Police or Designated Officer or the NSPCC Whistle blowing helpline (0808 800 5000) if they believe direct reporting is necessary to secure action.

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen. We recognise that a child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. However, if a child is found to continually make false allegations this may be a sign of mental health issues and a referral to services such as CAMHs (Child and Adolescent Mental Health) may be required.

An uncomfortable fact is that some professionals do pose a serious risk to pupils and we must act on every allegation. However, staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. Staff will be advised to contact their trade union and will also be given access to a named representative.

The full procedures for dealing with allegations against staff can be found in [Keeping Children Safe in Education - DfE 2022 \(Appendix 1\)](#).

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites. We will communicate this to all parties.

13. Recruitment, Selection and Pre-Employment Vetting

In recruiting and appointing staff the Executive Headteacher, the Heads of school and the federation's Governing Body have key responsibilities to create a culture of safe recruitment and, as part of that, adopt recruitment procedures (see [Appendix 8 Recruitment Checklist](#)) that help deter, reject or identify people who might abuse children. The Federation recognises that sometimes people who want to cause harm to children actively seek employment that provides them access to young people.

This part of the policy describes in detail those checks that are, or may be, required for any individual working in any capacity at, or visiting, the Eliot Bank and Gordonbrock Schools Federation. Our Governing body and all proprietors must act reasonably in making decisions about the suitability of the prospective employee based on checks and evidence including: criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information.

13.1 Recruitment

The Eliot Bank and Gordonbrock Federation ensures that all posts are advertised appropriately (either internally, externally or both) and that the advertisement makes clear the Federation's commitment to safeguarding and promoting the welfare of children and that safeguarding checks will be undertaken.

The Executive Headteacher, both Heads of School and two nominated Governors have currently undertaken the NCTL's accreditation for Safer Recruitment.

13.1.1 Advertising

All adverts contain 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 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.

All job descriptions make reference to the responsibility for safeguarding and promoting the welfare of children. All job descriptions and person specifications include skills, abilities, experience, attitude, and behaviours required for the post with specific reference to suitability to work with children.

13.1.2 Application Forms

The Federation uses the latest local authority's application forms for Teaching and Support Staff. These forms require the applicant 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; Legislation.gov.uk - section 7(1)(a) of the SVGA 2006.
- 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.
- self-declaration of their criminal record or information that would make them unsuitable to work with children.
- a signed 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.

These self-declarations will only be requested from applicants who have been shortlisted. The interview panel will view this declaration before shortlisting has been concluded.

13.1.3 Shortlisting

The Federation will ensure that at least two people carry out the shortlisting exercise and that those two people will carry out the interview for a consistent approach. The interview panel will:

- consider any inconsistencies and look for gaps in employment and reasons given for them;
- consider carrying out additional online checks/searches for shortlisted candidates. This may help identify any incidents or issues that have happened, which are publicly available online which may be explored with the applicant at interview; and
- explore all potential concerns.

13.1.4 Selection

The interview panel will use a range of selection techniques to identify the most suitable person for the post.

Those interviewing will agree structured questions. These 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.

The interviews are conducted in a way to explore potential areas of concern 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.

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

Pupils/students are involved in the recruitment process in a meaningful way wherever possible, but definitely for the appointment of teaching staff. Part of the interview for teaching staff is to observe the short listed candidates and their interaction with pupils/students.

All information considered in decision making is clearly recorded along with the decisions made.

13.2 Definition of Regulated Activity

Regulated activity includes:

- a)¹ teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children.
- b)¹ 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.

Some activities are always regulated activities, regardless of their 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, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing;
 - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

The federation will consider a person to be in regulated activity 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; or
- will be working on a regular basis in a specified establishment, such as a school, for 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 overnight activity, even if this happens only once.

For all other staff 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. This would include contractors that would have the opportunity for contact with children and who work under a temporary or occasional contract.

¹ Work under (a) or (b) is regulated activity only if done regularly.

At the Eliot Bank and Gordonbrock Schools Federation, a supervised volunteer who regularly teaches or looks after children is not in regulated activity. The Eliot Bank and Gordonbrock Schools Federation will consider the separate statutory guidance by the Department for Education (DfE) on supervision and regulated activity, when considering which checks should be undertaken on volunteers.

13.3 Types of check

13.3.1 Disclosure and Barring Service (DBS) checks

- **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 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 2002.68
- **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 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 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.

The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work at the Eliot Bank and Gordonbrock Schools Federation, as outlined in this policy.

Most staff in the Eliot Bank and Gordonbrock Federation will be working with children and 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.

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.

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

In addition to obtaining the DBS certificate described, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

Once the checks are complete, the DBS will send a certificate (the DBS certificate) to the applicant and the Local Authority's DBS system will automatically be updated with the DBS details and outcome. If the outcome does not contain any information, the Eliot Bank and Gordonbrock Schools Federation requests that applicant must show the original DBS certificate to the school's designated DBS checker (i.e. the Federation Business Manager or the SAO) before they take up post or as soon as practicable afterwards. This will enable the Federation 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. If the DBS check contains information of previous convictions, cautions, reprimands, final warning, etc. the federation will be notified via the Local Authorities DBS check system and the applicant will need to present the original to a Local Authority's centrally employed designated Safer Recruitment Officer, who will pass this on to the Local Authority's Safer Recruitment Panel, who will assess cases fairly, on an individual basis. A decision not to appoint somebody because of their conviction(s) will be clearly documented, so if challenged the Local Authority and the Federation can defend their decision, in line with the LA's policy on recruitment of ex-offenders.

When assessing any disclosure information on a DBS certificate the Local Authority and the Federation will take into consideration the explanation from the applicant, including for example:

- the seriousness 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
- has the individual accepted responsibility for their actions?

The Local Authority and the Eliot Bank and Gordonbrock Schools Federation will also consider the incident in the context of the [Teachers' Standards](#) and [Teacher misconduct guidance](#), if the applicant is applying for a teaching post.

Where the individual starts to work in regulated activity before the DBS certificate is available, the Federation will ensure that the individual is appropriately supervised (documented through an appropriate Risk Assessment) and that all other checks, including a separate barred list check, have been completed.

The Federation will only carry out separate barred list checks 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 213 have been carried out); or,
- For staff who work in childcare provision or who are directly concerned with the management of such provision, the Federation insists that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2018.

If the federation has reason to believe that an individual is barred it will not allow the individual to carry out any form of regulated activity.

For more information please see [Appendix 9, Flowchart of Disclosure and Barring Service Criminal Record Checks and barred List Checks](#).

13.3.2 DBS Update Service

Individuals can join the DBS Update Service at the point an application for a new DBS check is made, enabling future status checks to be carried out to confirm that no new information has been added to the certificate since its issue. This allows for portability of a certificate across employers. Before using the Update Service the Federation will:

- obtain consent from the applicant to do so;
- confirm the certificate matches the individual's identity; and
- examine the original certificate to ensure that it is for the appropriate workforce and level of check, e.g. enhanced certificate/enhanced including barred list information.

Once these checks have been carried out, the Federation can then subsequently carry out a free online check. This would identify whether there has been any change to the information recorded, since the initial certificate was issued and advise whether the individual should apply for a new certificate. Individuals will be able to see a full list of those organisations that have carried out a status check on their account. Further information about the update service can be found at GOV.UK.

13.3.3 Pre-Appointment Checks

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, will be conditional on satisfactory completion of the necessary pre-employment checks.

The Eliot Bank and Gordonbrock Schools Federation will:

- verify a candidate's identity at the point of their interview using the government's guidelines, which can be found on the GOV.UK website; i.e. from current photographic ID and proof of address
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity);
- in case of an individual starting employment, before a DBS check outcome has been received: obtain a separate barred list check and ensure that the individual is appropriately supervised (documented through an appropriate Risk Assessment) and that all other checks, including a separate barred list check, have been completed.
- verify professional qualifications, as appropriate. The Federation uses the Teaching Regulation Agency's (TRA) Employer Access Service to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

- use the Government's Teacher Service Portal, check that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State or has no sanctions or restrictions imposed by the GTCE, before its abolition in March 2012.
- 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.
- 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. This is done through the council's medical declaration form and its occupational health services, if further checks have to be undertaken.
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, then we will follow the advice given on the appropriate government's website GOV.UK;
- if the person has lived or worked outside the UK, we will undertake further checks we consider appropriate; and
- make sure that a Certificate of Good Conduct is received and filed or a Risk Assessment is in place, if it's not obtainable.
- For teachers only: make sure that (from 01/01/2021) a letter of professional standing from the professional regulating authority in the country in which the applicant has worked has been received and filed

The Federation uses the DfE Teaching Regulation Agency to ensure that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State.

Where an enhanced DBS certificate is required, it will be obtained from the candidate before or as soon as practicable after, the person's appointment.

Although the Federation could refrain from obtaining an enhanced DBS certificate or carrying out checks for events that may have occurred outside the UK if, in the three months prior to their appointment, the applicant has worked:

- in a school in England in a post, which brought them into regular contact with children or young persons in any post in a school since 12 May 2006; or
- in an 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.

It will still undertake a new enhanced DBS check including a barred list check for all new staff in regulated activity to ensure the Federation has up to date information. All other 'pre-appointment checks will also still be completed.

The Federation is aware that the DBS cannot provide barred list information on any person, including volunteers, who are not in or seeking to enter in regulated activity.

13.3.4 Employment History and References

The Eliot Bank and Gordonbrock Federation will always ask for written information about previous employment history and check that information is not contradictory or incomplete. Where possible, references will be sought on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview. The purpose of seeking references is to obtain objective and factual information to support appointment decisions. In any case, references will always be obtained, scrutinised and any concerns resolved satisfactorily, before the appointment starts. An Offer of appointment prior to receiving satisfactory references will always be conditional of receiving satisfactory references and satisfactory pre-employment checks. References will always be requested directly from the referee.

The Eliot Bank and Gordonbrock Schools Federation does:

- 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 to 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.

The Federation's reference template ensures the information confirms whether the referee is satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding allegations but should not include information about allegations which are unsubstantiated, unfounded, false, or malicious.

On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate: for example, if the answers are vague. They will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any information about past disciplinary action or allegations will be considered carefully when assessing the applicant's suitability for the post (including information obtained from the Teacher Regulation Agency referred to previously).

13.3.5 Checks on Individuals Who Have Lived or Worked Outside the UK

Individuals who have lived or worked outside the UK will undergo the same checks as all other staff in the Eliot Bank and Gordonbrock Primary Schools Federation. This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, we will make any further checks we think appropriate, so that any relevant events that occurred outside the UK can be considered.

Following the UK's exit from the EU, the Eliot Bank and Gordonbrock Schools Federation applies 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 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 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. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body. Where available, such evidence will be considered together with information obtained through other pre-appointment checks to help assess their suitability.

Where this information is not available to the Federation, we will seek alternative methods of checking suitability and / or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, the Eliot Bank and Gordonbrock Schools Federation will 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](#).

Not all countries provide criminal record information, and where they do, the nature and detail of the information provided varies from country to country. The Eliot Bank and Gordonbrock Federation will 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.

The Eliot Bank and Gordonbrock Schools Federation will always verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, we will follow the Council's guidance and advice on the bGov.UK website.

All schools have a statutory duty under the new Home Office Guidance issued on 6 April 2017 which states that: ***“All Tier 2 (General) visa applicants who want to work in specified health, education or social care sectors must provide a criminal record certificate and so for all new appointments, schools must consider additional checks, including obtaining a Certificate of Good Conduct, where staff have ever lived or worked abroad”.***

The requirement is applicable to **all** *Tier 2 (General) staff from any country (excluding the United Kingdom and Northern Ireland), where an individual has lived or worked for more than 12 months+ either in total or continuously as well as within the previous 10 years.

In Lewisham local authority, all new employees who have ever lived or worked abroad for 12 months+ either in total or continuously since the age of 18 years, will be risk assessed before making a decision as to whether further checks are appropriate, in accordance with statutory guidance in [Keeping Children Safe in Education – DfE 2022 \(appendix 1\)](#).

It is not a legal requirement for existing staff who have ever lived or worked abroad for 12 months+ in total or continuously since the age of 18 years, but the governing body and senior leadership at have made the decision that we will/will not risk assess existing staff to make a decision whether or not we will pursue overseas criminal records checks for existing members of staff, volunteers or governors.

13.3.6 Agency and Third-Party Staff

The Eliot Bank and Gordonbrock Schools Federation will always obtain written notification from any agency, or third party organisation, that they have carried out the checks on an individual who will be working at the Federation that we would otherwise perform. In respect of the enhanced DBS check, the Federation insists on written notification confirming the certificate has been obtained by either the employment business or another such business.

Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the Eliot Bank and Gordonbrock Schools Federation, which has disclosed any matter or information, or any information was provided to the employment business, the Federation will obtain a copy of the certificate from the agency.

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

The Eliot Bank and Gordonbrock Schools Federation also checks that the person presenting themselves for work is the same person on whom the checks have been made, by asking for one form of photo ID on their first day of work at the Federation.

The Eliot Bank and Gordonbrock Schools Federation will only use supply staff agencies that are able to provide full written vetting information about their staff prior to them starting work at the school. The vetting information must contain the following:

- Photograph
- ID Evidence
- Teaching Agency Check
- DfE and Welsh Assembly Number
- Qualification Evidence
- Medical Check
- Barred List Check and Date
- Valid DBS Date
- Enhanced DBS number
- Further Disclosure Information, if necessary
- Right to work in the UK Check
- Overseas checks/Risk Assessment
- References Check
- CV History Check
- Confirmation of Level 1 safeguarding training in the last 12 months.

We ask supply agencies to email the vetting info to the Federation Business Manager / SAO, as well as to the Receptionist.

The school's Receptionist checks this evidence, along with a valid photographic ID (i.e. driving licence, passport), on arrival, checking that the person presenting themselves for work is the same person on whom the checks have been made. Any discrepancies will be reported to the Business Manager/ SAO immediately and the agency staff will not be able to start their work, until satisfactory checks have been concluded.

13.3.7 Trainee/Student Teachers

Where applicants for initial teacher training are salaried by the Federation, we will ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including and barred list information) will always be obtained.

Where trainee teachers are fee-funded it is the responsibility of the initial teacher training provider to carry out the necessary checks. We will obtain written confirmation from the training provider that these checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. The DfE guidance states that there is no requirement for the Federation to record details of fee-funded trainees on the single central record, however we do record this information under non statutory information (Students/Volunteers) on the SCR.

13.3.8 Existing Staff

If either Eliot Bank or Gordonbrock Primary School has concerns about an existing staff member's suitability to work with children, we will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at either school moves from a post that was not regulated activity, into regulated activity, the relevant checks for the regulated activity must be carried out. Apart from these circumstances, we are not required to request a DBS check or barred list check.

The Eliot Bank and Gordonbrock Schools Federation will, under their legal duty, refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult, where the harm test is satisfied in respect of that individual, the individual has received a caution or conviction for a relevant offence or if there is reason to believe that individual has committed a listed relevant offence and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.

The DBS will consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual.

Where we dismiss or cease to use the services of a teacher because of serious misconduct, or would have dismissed them or ceased to use their services had they not left first, we will refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

13.3.9 Volunteers

Under no circumstances will a volunteer, in respect of whom no checks have been obtained, be left unsupervised or allowed to work in regulated activity.

Volunteers who, on an unsupervised basis, teach or look after children regularly, or provide personal care on a one-off basis in schools and colleges will be in regulated activity therefore we will obtain an enhanced DBS Certificate (which includes barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, as with other staff in regulated activities we will conduct a repeat DBS check (which includes barred list information) on any such volunteer on a three-year basis.

The Federation may obtain an enhanced DBS certificate (not including barred list information), for volunteers who are not engaging in regulated activity but have the opportunity to come into contact with children on a regular basis, e.g. supervised volunteers, if deemed necessary. However, we acknowledge that we are not legally permitted to request barred list information on a volunteer who, because they are supervised, is not in regulated activity.

The federation will undertake a risk assessment and use its professional judgement and experience when deciding whether to seek an enhanced DBS check for any volunteer not engaging in regulated activity. In doing so they should consider: the nature of the work with children; what the federation 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 suitability; and whether the role is eligible for an enhanced DBS check.

The Protection of Freedoms Act 2012 amended the Safeguarding Vulnerable Groups Act 2006, removing supervised volunteers from regulated activity and applying a duty on the Secretary of State to issue guidance to assist regulated activity providers such as schools and colleges, to decide what level of supervision is required so that this exclusion would apply. If the volunteer is to be supervised while undertaking an activity that would be regulated activity if it were unsupervised, the statutory guidance must be followed. The guidance issued following this change requires that: there must be supervision by a person who is in regulated activity; the supervision must be regular and day-to-day; and the supervision must be “reasonable in all the circumstances to ensure the protection of children”.

The DBS cannot provide barred list information on any person, including volunteers, who are not in or seeking to enter regulated activity.

13.3.10 Maintained School Governors

The Eliot Bank and Gordonbrock Federation insist that all its Governors have an enhanced Criminal Records Certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their governors who does not already have one. Governance is not a regulated activity and so they do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity. A risk assessment will be completed to ascertain if any members of the governing body are taking part in regulated activity with children. If it is determined that any person is taking part in regulated activity, a barred list check will be requested. They must do this by 1 September 2016 where a governor was elected before 1 April 2016 and within 21 days of appointment or election if a governor is elected or appointed after 1 April 2016.

All new governors will be asked to declare their overseas history and where necessary, complete a risk assessment. Existing governors will also/will not be required to complete an overseas criminal history risk assessment in line with our agreed school procedures.

All governors must also undergo a Section 128 check to confirm any directions which may have been made against them by the Secretary of State. This check will be carried out using the NCTL Teacher Service Portal (formerly known as the Employer Access Online service).

All governors should receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

All governors and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010 22, (including the Public Sector Equality Duty 23), and their local multi-agency safeguarding arrangements

13.3.11 Contractors

The Eliot Bank and Gordonbrock Federation will ensure that any contractor, or any employee of the contractor, who is to work at either school has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information).

For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites.

Under no circumstances should a contractor, in respect of whom no checks have been obtained, be allowed to work unsupervised, or engage in regulated activity. Each case will be assessed individually to determine the appropriate level of supervision depending on the circumstances.

If a contractor working at the Federation is self-employed, we will obtain the necessary DBS check on their behalf, as self-employed people are not able to make an application directly to the DBS on their own account.

In addition to the above, the Federation will always check the identity of contractors and their staff on arrival at the either school.

13.3.12 Visitors

The Eliot Bank and Gordonbrock Federation does not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for general visitors (for example children's relatives or other visitors attending a sports day). The Executive Headteacher and/or the Head of School will use their professional judgment about the need to escort or supervise visitors in accordance with the signing in/ visitor lanyard / sticker system.

For visitors who are visiting the Federation in a professional capacity, ID checks will be undertaken upon arrival. Additionally, the Federation needs to be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). For more information, please see [Appendix 10, Visitors to School Policy](#).

13.3.13 Alternative Provision

Where the Eliot Bank and Gordonbrock Schools Federation places a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil.

The Federation will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the Federation would otherwise perform in respect of its own staff.

13.4 Single Central Record (SCR)

Each school within the federation keeps a single central record, referred to in the regulations (described in the following paragraph) as the register.

The single central record covers the following staff who work within the Federation:

- all staff members (including supply staff) who work at the school;
- all others who work in regular contact with the children including agency and third-party supply staff (Even if they work for one day) and volunteers; and
- Governors.

The checks are as follows:

- an identity check;
- a barred list check;
- an enhanced DBS check/certificate;
- a prohibition from teaching check;
- further checks on people who have lived or worked outside the UK;
- a check of professional qualifications and
- a check to establish the person's right to work in the United Kingdom.

For supply staff, the information recorded on the single central record will also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates and whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

Where checks are carried out on volunteers, we will record this on the single central record.

Neither Eliot Bank nor Gordonbrock Primary School will keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. On occasions, the schools might choose to retain a copy for verification purposes, but this will not be retained for longer than six months. This ensures that the Federation complies with the requirements of the Data Protection Act. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications is kept in their confidential personnel file.

14. Extended School Arrangements

Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply and the DSL will be available.

If other organisations provide services or activities on our site we will check that they have appropriate procedures in place, including safer recruitment procedures and clarify whose procedure is to be followed if there are concerns. There will be clear communication channels to ensure the DSL is kept appropriately informed.

15. Health & Safety

Our Health & Safety Policy, set out in a separate document, reflects the consideration we give to the protection of our children physically within the school environment.

15.1 Site Security

We have a number of security measures in place including CCTV, security gates and security entrance doors.

We have rigorous procedures for ensuring all visitors to the Federation sign in and have School ID that confirms they have permission to be on site. All visitors are expected to enter through one entrance and observe the school's safeguarding and health and safety regulations to ensure children in school are kept safe.

The Head of School will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

15.2 Risk Assessments

We have a number of risk assessments and are constantly adding to them and updating them. Our risk assessments fall into three main categories:

- Health and Safety (Premises file)
- Visits and Visitors (Curriculum network)
- Curriculum (Curriculum network)

16. Attendance / Missing Children

We understand the links between children who might be at risk and poor attendance. In particular, we follow up on any child who goes missing. All staff will be aware of the signs of risk and individual triggers including travelling to conflict zones, FGM and forced marriage. We therefore:

- work closely with the LA's ESW service;
- analyse attendance data;
- monitor attendance closely and implement a range of strategies to tackle poor attendance e.g. first day calls, requirement of doctor's notes and family support; and
- do not remove a child from our register without agreement with the LA.

17. Online Safety & 18. Digital Safeguarding

Our pupils use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use digital technologies to harm children. The harm might range from sending hurtful or abusive communications, to enticing children to engage in sexually harmful conversations, webcam photography, encouraging radicalisation or face-to-face meetings.

The breadth of issues classified within online safety can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm

The school's [Online Safety Policy \(Appendix 11a\)](#) explains how we aim to keep pupils safe in school which includes reasonable filters and monitoring. Acceptable IT use for staff and pupils is enforced and parents are also informed of expectations. See [Acceptable IT Use Policy \(Appendix 11b\)](#).

Cyberbullying and sexting by pupils, via texts and emails, will be treated as seriously as any other type of bullying and in the absence of a child protection concern will be managed through our anti-bullying and confiscation procedures. See [Appendix 12 for our Bullying and Harassment Policy](#) which includes cyber bullying.

Chatrooms and some social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access these sites in school. Some pupils will undoubtedly be 'chatting' outside school and are informed of the risks of this through PSHCE/RSE. Parents are strongly advised to consider measures to keep their children safe when using social media.

19. Physical Intervention / Positive Handling

All staff are encouraged to use de-escalation techniques and creative alternative strategies that are specific to the child. Physical intervention is only ever used as a last resort and all incidents of this are reviewed, recorded and monitored. Reasonable force will be used in accordance with government guidance. See [Appendix 13 Use of Reasonable Force Policy](#).

20. School Visits

We have clear protocols in place to ensure the safety of children whilst on school trips. These include:

- [Educational Visits Policy \(Appendix 14a\)](#)
- Clear [Educational Visits Procedures \(Appendix 14b\)](#)
- Staff use of pro-formas to document all visits and these are to be agreed by the Educational Visits Coordinator (Executive Head / Head of School): [Visit Proposal Form \(Appendix 14c\)](#), [Risk Assessments \(Appendix 14d\)](#), [Provider Statement \(Appendix 14e\)](#), [Pre-Visit Vetting Form \(Appendix 14f\)](#) and [EVC Checklist & Approval \(Appendix 14g\)](#)
- [Emergency Procedures whilst on Educational Visits \(Appendix 14h\)](#)
- [Briefing for Parents Going on the Trips \(Appendix 14i\)](#)
- School Contact Information Cards

21. Use of Mobile Phones / Photography and Images

Use of mobile phones see our [Mobile Phone Policy, Appendix 15](#).

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect pupils we will:

- seek parental consent for photographs to be published (for example, on our website or in newspapers or publications);
- not use pupil's full name with an image;
- ensure pupils are appropriately dressed;
- ensure that personal data is not shared;
- store images appropriately, securely and for no longer than necessary;
- only use school equipment, i.e. not personal devices;
- encourage pupils to tell us if they are worried about any photographs that are taken of them; and
- instruct parents, whenever applicable i.e. productions/assemblies/trips that they must not post any photographs on social media.

22. Looked after Children

There is a designated teacher for looked after children who promotes their educational achievement and ensures that appropriate staff have the information they need in relation to a child's looked after legal status and contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL, through the designated teacher for looked after children, will have details of the child's social worker and the name of the virtual school head in the in the authority that looks after the child. They will work with the virtual head to discuss how Pupil Premium Plus funding will be best used to meet the needs identified in the child's Personal Education Plan.

There is a designated Governor for looked after children.

22.1 Partnership with Parents

The federation shares a purpose with parents to educate and keep children safe from harm and to have their welfare promoted. This is explained to parents in our prospectus and during the introductory meeting before a child starts school.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, with dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so to protect a child.

School will share with parents any concerns we may have about their child, unless to do so may place a child at risk of harm. We encourage parents to discuss any concerns they may have with their child's teacher or a child and family worker in the first instance.

22.2 Partnership with Others

The federation recognises that it is essential to establish positive and effective working relationships with other agencies who are partners in the Lewisham Safeguarding Children Partnership.

The federation works closely with a range of outside agencies, which include Children's Social Care, the Police, Health Care Professionals, CAMHS, PCT, Educational Welfare Service and a range of family intervention and support groups. There is a joint responsibility on all agencies to share information to ensure the safeguarding of all children. This work includes:

- providing a coordinated offer of early help where needs are identified;
- contributing to inter-agency plans to support children who are subject to child protection plans;
- allowing access for children's social care;
- ensuring safeguarding arrangements take in to account the procedures and practices of the local authority (LA); and
- nominating a member of the governing body to liaise with the LA or others in the event of allegation against the headteacher or proprietor.

23. Child Protection

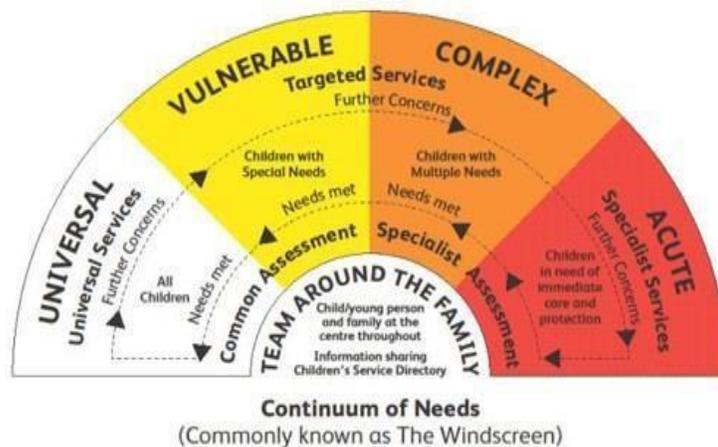
There is a difference between a safeguarding concern and a child in immediate danger or at risk of significant harm. Our Child protection policy reflects this.

Refer to Lewisham Safeguarding Children Partnership (LSCP) Thresholds for Intervention Guidance. This document guides professionals in determining the levels of need when making a judgement and assessment of the child and their family.

Refer to [Appendix 2, Definitions, Recognising and Responding to Abuse.](#)

If there are any doubts, discuss with the designated lead or deputy lead for child protection. The designated person will make a decision as to which level of vulnerability the child is at. Advice or guidance can be obtained from the LA Multi Agency Safeguarding Hub (MASH) 020 8314 6660. Email mashagency@lewisham.gov.uk. Hours Monday-Friday 9am-5pm. If you have concerns about a child outside of these hours, please contact the emergency duty team to speak to the out-of-hours duty social worker on 020 8314 6000.

Support for our children is based on the Lewisham Children Safeguarding Partnership (LSCP) Thresholds for Intervention guidance January 2019 (revised)



23.1 Universal

Children with no additional needs and children who may from time to time require additional support that can be met within universal services.

We recognise that there are a number of children within the federation who could be described as 'vulnerable.' Whilst the child is not in immediate danger, staff members may have ongoing concerns. For example, children who are:

- missing education/missing from education;
- young carers;
- looked after children (LAC);
- privately fostered children;
- affected by domestic abuse;
- affected by substance misuse/drug use;
- affected by mental health issues including self-harm and eating disorders;
- affected by poor parenting;
- at risk of fabricated or induced illness;
- at risk of gang and youth violence;
- asylum seekers;
- vulnerable to being bullied, or engaging in bullying including cyber, homophobic, SEND racist etc;
- live transient lifestyles;
- lesbian, gay, bisexual, transgender (LGBT);
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- vulnerable to extremism or radicalisation;
- vulnerable to faith abuse;
- involved directly or indirectly in child sexual exploitation (CSE) or trafficking;
- do not have English as a first language; and
- at risk of Honour Based Violence (HBV) including female genital mutilation (FGM) and forced marriage.

We identify these children in a number of ways:

- daily monitoring/observation
- circle times
- dialogue with parents
- dialogue with other professionals
- all concerns are recorded by the class teacher on a [Child Protection Monitoring Form \(Appendix 16\)](#) kept in the register file and reported to the DH for Inclusion, weekly. This DH for Inclusion will evaluate the information and decide what action is required.

23.1.1 Early Help in School Support

Our aim is to give early help, making a significant and timely intervention to secure the child's safety and wellbeing within their family.

We make use of a wide range of strategies and professionals recognising that it is often small, personal touches that can improve the situation for the child. We also recognise that supporting a family will benefit the vulnerable child. Our support includes:

- individual or group time with learning mentors
- additional support from member of SLT/ SENDCo/Teacher/Support staff
- circle time
- social groups
- playground support
- informal conversations with parents/carers

23.2 Vulnerable/Additional Needs – Level 2

Children and families with additional needs who are in need of coordinated Early Help and support from services.

Assessment Process:

- Two or more services work together to meet child and family needs, coordinated by a service that knows the child/family best;
- An early help assessment should be completed to gain a full understanding of the family's needs;
- a TAF will be convened; and
- a plan will be agreed with the family, identifying clear outcomes to be achieved and progress regularly reviewed.

23.2.1 Early Help using Local Agencies

Where in school strategies have not succeeded, effective early help relies upon local agencies working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.

Key agencies that may provide support at this level:

- Youth crime prevention services
- Youth service
- Targeted drug and alcohol information, advice and education
- Attendance and welfare,
- Children's centres (e.g. parenting programmes)
- Prevent
- Job Centre Plus (and other employment services)
- Online counselling services
- Health visitors
- School nursing
- Early years childcare settings
- Young carers
- Adult mental health
- SALT

23.3 Multiple/Complex Needs – Level 3

Children and families with complex needs that are likely to require longer-term intervention; they will require a named lead professional and a TAC.

Because of the complexity of needs, especially around behaviour and parenting, a multidisciplinary / agency coordinated plan developed with the family is needed, coordinated by a lead professional.

The integrated family support service will work with families at this level of need in addition to local health services, voluntary sector providers and children's centres.

Assessment process:

- Where practitioners identify that a child and their family would benefit from a more intensive multidisciplinary response than they can provide, they should discuss this with the family and complete an early help assessment.
- The early help assessment needs to identify the child's and family's needs and develop a SMART plan to address these.
- If a more intensive level of family support is needed from the Council's commissioned family support service, a MASH request should be submitted, ticking "help and support".
- A Team around the Family (TAF) is to be convened and a lead professional to be identified. There is an expectation that the TAF will have worked intensively together to meet the additional needs of the child and the family.

23.4 Acute/ Specialist Needs – Level 4

Children with complex additional unmet needs or complex learning and/or medical needs; this is also the threshold for Child Protection procedures for children or young people who are experiencing significant harm.

Where specialist services are needed, we ensure that we act quickly and appropriately to provide this support.

If the concern is serious it should be reported immediately to one of the designated leads for child protection.

Assessment Process

- If a child is at risk of physical, emotional, sexual abuse, or neglect, the DSL will refer to MASH using the single request form and selecting "protection" or phone 020 8314 6660 or the Out-of-hours services from 6pm – 8am contact the Lewisham Town Hall switchboard on 020 8314 6000. Where an immediate response is required because of the child's physical / medical health dial 999 for an ambulance.
- Where a child's safety is at immediate risk contact the police by dialling 999.
- After any immediate protective action has been taken the DSL will need to speak in person to children's social care.
- A request for help and support or protection form is to be completed and submitted to the Lewisham MASH.

- Where using the continuum of need a professional considers that a statutory social work assessment of the child's needs and circumstances should be undertaken the single request form should be completed. In submitting such a request the referrer should attach any supporting documentation such as a description of the TAF activity, early help assessments and early help reviews.

If the child is in immediate danger anybody can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

23.5 Preventing Extremism and Radicalisation

From July 2015 all schools are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015.

There is no place for extremist views of any kind in our federation, whether from internal sources – children, staff or governors, or external sources - school community, external agencies or individuals. Our children see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

As a federation we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for children and so should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views we are failing to protect our children.

The Prevent duty advice summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

For more information please see [Appendix 17, Preventing Extremism and Radicalisation Policy](#).

23.6 Responding to a Disclosure

Please refer to [Appendix 2, Definitions, Recognising and Responding to Abuse](#).

23.7 Confidentially and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL/Headteacher, Deputy DSL or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with General Data Protection Regulation (GDPR), 2018 principles. Information is:

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort should be made to prevent unauthorised access and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items should also be kept in locked storage. Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of GDPR, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they should refer the request to the head teacher.

GDPR principles do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. When information is shared, the reason for doing so as well as the reasons why consent may not have been sought, will be clearly documented within the child protection records. *'Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect'. Information Sharing – DfE guidance 2018*

When a child leaves the school (including in year transfers) their Child Protection files will be copied with the copies archived and stored securely for 7 years, and the original securely packaged and transferred by hand or secure delivery to the new school. The designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. The DSL should ensure a copy of the file is kept for their own records.

Appendices

Appendix 1	<u>Keeping Children Safe in Education – 2022</u>
Appendix 2	<u>Definitions, Recognising and Responding to Abuse</u>
Appendix 3	<u>Staff Code of Conduct</u>
Appendix 4	<u>Intimate Care Policy</u>
Appendix 5	<u>Promoting Fundamental British Values as Part of Spiritual, Moral, Social and Cultural Development</u>
Appendix 6	<u>Whistleblowing Policy</u>
Appendix 7	<u>Local Authority Procedure for Managing Allegations Made Against Adults Who Work With Children</u>
Appendix 8	<u>Recruitment Checklist</u>
Appendix 9	<u>Flowchart of Disclosure and Barring Service Criminal Record Checks and Barred List Checks</u>
Appendix 10	<u>Visitors to School Policy</u>
Appendix 11a	<u>E-Safety Policy</u>
Appendix 11b	<u>Acceptable IT Use Policy</u>
Appendix 12	<u>Bullying & Harassment Policy</u>
Appendix 13	<u>Use of Reasonable Force Policy</u>
Appendix 14a	<u>Educational Visits Policy</u>
Appendix 14b	<u>Educational Visits Procedures</u>
Appendix 14c	<u>Visit Proposal Form</u>
Appendix 14d	<u>Risk Assessment (Template)</u>
Appendix 14e	<u>Provider Statement</u>
Appendix 14f	<u>Pre-Visit Vetting Form</u>
Appendix 14g	<u>EVC Checklist & Approval</u>
Appendix 14h	<u>Emergency Procedures</u>
Appendix 14i	<u>Parent Briefing</u>
Appendix 15	<u>Mobile Phone Policy</u>
Appendix 16	<u>Child Protection Monitoring Record Sheet</u>
Appendix 17	<u>Preventing Extremism & Radicalisation Safeguarding Policy</u>