



ST ALBANS
SCHOOL

ST ALBANS SCHOOL

Safeguarding Policy

Date of review	August 2025
Effective date	1 September 2025
Date of next review	August 2026
Responsibility for review	DSL and Nominated Safeguarding Governor
Circulation	Governors, all staff, volunteers, parents on request
	Available on website
Status	Complies with paragraph 3(2)(b) of the Schedule to the Education (Independent School Standards) (England) Regulations 2014, Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2025)

ST ALBANS SCHOOL CONTACT DETAILS	
Safeguarding Team	safeguarding@st-albans.herts.sch.uk
Designated Safeguarding Lead (DSL)	Chris Johnston Head of Middle School Designated Teacher for Children Looked After (CLA) Prevent Lead 01727 515241 ccjohnston@st-albans.herts.sch.uk
Deputy Designated Safeguarding Leads (DDSL)	Melody Jones Second Master Mental Health and Online Safety Lead 01727 515142 mjones@st-albans.herts.sch.uk
	Gareth Nichols Deputy Head - Staff 01727 515167 gdnichols@st-albans.herts.sch.uk
	Gary Walker Head of Sixth Form 01727 515141 gjwalker@st-albans.herts.sch.uk
	Gareth Burger Head of Third Form 01727 515215 gsburger@st-albans.herts.sch.uk
	Nicolette Liston Head of Lower School 01727 515205 nmliston@st-albans.herts.sch.uk
Headmaster	Joe Silvester 01727 515085 hm@st-albans.herts.sch.uk
Chair of Governors	Neil Osborn nosborn@st-albans.herts.sch.uk
Nominated Safeguarding Governor	Matthew Cawthorne 01923 246186 / 07990 548000 mcawthorne@st-albans.herts.sch.uk
Deputy Nominated Safeguarding Governor	Chris Oglethorpe coglethorpe@st-albans.herts.sch.uk
School Counsellor	Jane Mitchell 07340 507687 jmmitchell@st-albans.herts.sch.uk
Head Nurse	Olivia Valeny 01727 515292 orvaleny@st-albans.herts.sch.uk
HERTFORDSHIRE CHILDREN'S SERVICES	

Herts Children's Services	0300 123 4043
Local Authority Designated Officer (LADO)	LADO.Referral@hertfordshire.gov.uk
Senior Child Protection School Liaison Officer	Christina Lea
Local Early Help offer in Hertfordshire	https://www.hertfordshire.gov.uk/microsites/families-first/families-first.aspx
Prevent	prevent@herts.police.uk
OTHER CONTACTS	
NSPCC Helpline	0808 800 5000 0800 028 0285 0808 1000 900 (Sexual Harassment or Abuse) help@nspcc.org.uk
Children's Commissioner	020 7783 8330
Childline	0800 1111
Local police (emergency)	999
Local police (non-emergency)	101
Independent Schools Inspectorate	0207 600 0100
Hertfordshire Safeguarding Children Partnership Team	0300 123 4043

TABLE OF CONTENTS

Useful Contacts

Safeguarding Statement

1. **Our Safeguarding Policy**
2. **What to do if you have concerns**
3. **Management of safeguarding at St Albans School**
4. **Signs and forms of abuse**
5. **Allegations of abuse against staff**
6. **Allegations against pupils (Child-on-Child abuse)**
7. **Other safeguarding issues**

Appendix A: Code of Professional Conduct

Appendix B: Recruitment and Selection Policy and Procedure

Addendum to Safeguarding Policy – Remote Education

Support, Information, advice and guidance

In this policy references to the DSL should be taken to include the DDSLs.

SAFEGUARDING STATEMENT

The School's responsibility to safeguard and promote the welfare of pupils is of paramount importance. All Governors, staff and volunteers have responsibility for the implementation of this policy. As a Charity we recognise that we have a wider duty to ensure that others who come into contact with the School do not, as a result, suffer harm.

We endeavour to provide a safe and welcoming environment where pupils are respected and valued. In all our actions we will consider what is in the best interest of the child as part of our vision to help all pupils flourish personally and intellectually. We will place the child at the centre of our decision making, working in partnership with them, their families, and those supporting them

The School aims to promote good behaviour amongst all of its pupils, with support, encouragement and guidance from all staff. As part of a happy and positive community, we expect all pupils to be diligent, honest and considerate in their relationships with others, and we expect staff to treat pupils with kindness and fairness. In so doing we aim to create an environment in which all members of the School community can thrive and feel respected and valued.

All staff are aware of indicators of abuse, neglect and exploitation so that they are able to identify cases of children who may be in need of help or protection. They will be aware of and follow our procedures to ensure that pupils receive effective support, protection and justice.

The School will refer cases of alleged or suspected abuse to appropriate agencies, such as the Local Authority or Police, and to work with these agencies in protecting children from harm.

The School will also work with external agencies, including Local Authorities, to provide additional 'early help' support and targeted interventions for pupils not at risk of serious harm, with the core aim of preventing future harm.

1. Our Safeguarding Policy

1.1 What is Safeguarding?

Safeguarding as defined in Keeping Children Safe in Education (2025) means:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

The legal definition of a child in the UK includes everyone under the age of 18.

Somebody may abuse or neglect a child by inflicting harm or by failing to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them, or more rarely, by others (e.g. online). See Section 4 for further information on signs and forms of abuse.

We aim to protect each pupil from any form of abuse, whether from an adult, another pupil or any other young person by:

- ensuring that all staff and volunteers are alert to the signs of abuse both in the School and from outside;
- establishing, maintaining and promoting an environment and ethos in which pupils the School staff and volunteers, feel safe and secure, are encouraged to talk and are confident of being listened to when they have concerns about the safety and wellbeing of a pupil ;
- ensuring that pupils are aware of how to safely report concerns they may have about their own safety and wellbeing or that of others, whether events occur on or off-site;
- working with the Parents to build an understanding of the School's responsibility for the welfare of their children;
- providing sufficient support and guidance so that pupils have a range of appropriate adults to whom they can talk if they experience difficulties;
- providing the services of the School Counsellor and Mental Health Support Mentor and ensure pupils know how to access this support in the School; and
- contributing to the prevention of abuse by ensuring that the provision of teaching helps pupils to protect themselves and develops responsible attitudes to adult life and parenthood; and dealing sensitively and appropriately with every suspicion or disclosure of abuse.

Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

Mental health challenges are not always a result of abuse or neglect. We also aim to support each pupil facing such challenges with appropriate strategies and interventions. These follow the same protocols as cases of abuse or neglect.

Whilst the focus of our safeguarding policy is on our pupils, as a Charity we recognise that we also have a wider duty to ensure that others who come into contact with the School do not, as a result, suffer harm.

1.2 Policy aims

The School's safeguarding policy's aims are:

- to recognise that the welfare of the child is paramount and that what is in the best interests of the child should be considered at all times;
- to ensure that relationships are positive between staff and pupils and among the pupils themselves;
- to establish and maintain an environment where pupils feel secure, are encouraged to talk and are listened to if they have a worry or concern;
- to ensure that the School is effective in promoting good behaviour and guarding against harassment and bullying, and that it deals constructively with any unacceptable behaviour, taking due account of any related difficulty or disability;
- to provide all staff with the necessary information, training and appropriate support to enable them to meet their safeguarding responsibilities and understand that all staff have a role to play in safeguarding children;
- to recognise that no child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs;
- to recognise that all children without exception have the right to protection from harm regardless of gender, ethnicity, disability and existing beliefs;
- to ensure consistent good practice; and
- to demonstrate the School's commitment with regard to safeguarding to pupils, parents and other partners.

This policy applies to all pupils in the school regardless of their age.

This policy applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

1.3 Addressees of this policy

This policy has been authorised by the Board of Governors. It must be followed by Governors, all members of staff (including supply staff) and volunteers.

It is available on the School website and to parents on request.

All Governors, members of staff and volunteers have a responsibility to provide a safe environment in which children can learn.

1.4 Other relevant policies

The Safeguarding Policy is one in a series of policies which relate to safeguarding. This should be read in conjunction with the School's:

- Anti-bullying Strategy
- Promoting Good Behaviour and Sanctions Policy
- Children Looked After Policy
- Code of Professional Conduct
- PSHEE and Citizenship Policy
- Relationships and Sex Education Policy
- ITT Policy

- Policy for the use of Force to Control or Restrain Pupils
- IT Use Policy - Staff
- IT Use Policy - Pupils
- Acceptable use of Mobile Devices
- Data Protection Policy
- Recruitment and Selection Policy and Procedures
- Disciplinary Procedures
- Whistleblowing Policy
- Missing Child Policy
- Host Families Policy
- Visiting Speakers Policy

1.5 Relevant procedures and guidance

The School follows the procedures established by Hertfordshire Safeguarding Children Partnership (HSCP) and is in accordance with locally agreed inter-agency procedures.

The safeguarding arrangements have regard to official guidance, including:

- Working Together to Safeguard Children (2023) (WTTSC)
- Keeping Children Safe in Education 2025 (KCSIE)
- The Prevent Duty (2023).
- The Education Act (2002)
- Education (Independent School Standards) Regulations 2014
- Children Act (1989)
- The Equality Act (2010)

1.6 Monitoring and evaluation

The School monitors and evaluates the content and implementation of its Safeguarding policy. This is done through termly meetings between the DSL and the Nominated Safeguarding Governor, and an annual safeguarding review by the Board of Governors. A safeguarding report is prepared each term for inclusion in the Headmaster's report to Governors. This includes the numbers of ongoing concerns with current pupils and any significant developments to procedures.

The School reviews its Safeguarding Policy annually, unless an incident, new legislation or guidance suggests the need for an interim review. The review is carried out by the DSL in consultation with the Headmaster and Nominated Safeguarding Governor. The revised policy is then reviewed and approved by the Board of Governors.

2. What to do if you have concerns

Safeguarding is everyone's responsibility. All Governors, staff and volunteers have a responsibility in school to be alert to the symptoms and triggers of abuse, neglect and exploitation or other safeguarding concerns, to share information (subject to confidentiality concerns - see Section 2.5 below) and work together to provide pupils with the help that they need. Providing early help is more effective in promoting the welfare of pupils than reacting later. If you are unsure about what your next step should be when you have a concern, then refer to the flowchart in Part One of KCSIE 2025.

All Governors, staff and volunteers are encouraged to have professional curiosity with regard to the wellbeing of the students; to ask questions and challenge responses when possible concerns come to light.

When a pupil is suffering, or likely to suffer harm it is important that a referral to Children's Services and, if appropriate, the Police, is made immediately.

See Section 4 for information on signs of abuse.

2.1 Reporting

All safeguarding concerns should be reported **immediately** to the DSL and followed up via a report on CPOMS. The DSL is more likely to have a complete safeguarding picture and be the most appropriate person to advise on the appropriate response to safeguarding concerns.

However,

- If the matter involves an allegation about any **member of staff or volunteer**, or the **DSL**, this must be reported to **the Headmaster, or in his absence the Chair of Governors, immediately**.
- If the matter involves an allegation against the **Headmaster or a Governor** this must be reported to **the Chair of Governors immediately (without informing the Headmaster in the case of complaints against the Headmaster)**.
- If the matter involves an allegation against the **Chair of Governors** this must be reported to **the LADO**.
- **The Local Authority Designated Officer (LADO) must be informed of any allegation made against a member of staff that meets the harm threshold, as set out in Hertfordshire Safeguarding Children's Partnership procedures, within 24 hours.**
- **If there is a conflict of interest in reporting a matter to the Headmaster, it should be taken directly to the LADO.**

Staff should follow the reporting procedures outlined in this policy. However, **they may also share information directly** with the LADO, Police or the NSPCC if:

- there is a **risk of immediate serious harm** to a pupil;
- the situation is an **emergency** and the DSL, the Headmaster and the Chair of Governors are all unavailable; and
- they are convinced that a direct report is the only way to ensure the pupil's safety. The DSL should be informed as soon as possible of the direct referral.

Staff should not assume that a colleague or another professional will act and share information that might be critical in keeping children safe. Each member of staff must take responsibility for safeguarding and maintain an attitude of 'it could happen here'.

Female Genital Mutilation (FGM): Whilst all staff should speak to the DSL about any concerns about FGM, there is a specific legal duty on teachers in relation to FGM. If a teacher, in the course of their work in the profession discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report it to the Police.

2.2 Initial disclosure

A member of staff, Governor or volunteer who hears a disclosure of abuse, neglect or other concern:

- must listen carefully to the pupil, keep an open mind and should not take a decision as to whether or not the abuse has taken place; must not ask leading questions, that is, a question which suggests its own answer;
- must not attempt to investigate the matter unless directed to by Children's Services or The Police;
- must reassure the pupil but not give a guarantee of absolute confidentiality. They should explain that they need to pass the information to the DSL who will ensure that the correct action is taken;
- must reassure the pupil that they are being taken seriously, that they will be supported and kept safe;
- must never give a pupil the impression that they are creating a problem by reporting abuse. They should never be made to feel ashamed for making a report, must keep a sufficient written record of the conversation, ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words;
- Records should be made as soon as possible after the concern is raised. The record should include the date, time and place of the conversation and the essence of what was said (verbatim if possible) and done by whom and in whose presence. It should use names, not initials. Physical appearance or behaviour of the pupil should be recorded as factually and accurately as possible;
- A record of the conversation should be entered onto CPOMS. If not, then the written record should be signed by the person making it, kept securely and handed promptly to the DSL. In the case of contractors, the record may need to be passed to the DSL via their line manager; if so, this must be done without delay. In all cases staff should inform the DSL about their concern as soon as possible and, where the concern involves a disclosure or concern that the pupil is at risk of harm, they must inform the DSL immediately.

The above procedures should also be followed in the event of an allegation/complaint of abuse by one or more pupils against another pupil.

2.3 Action by the Designated Safeguarding Lead

The DSL will follow the following guidelines in deciding what action to take and will refer to local agency threshold guidance to support their analysis and rationale for any decision.

The DSL will usually speak to the pupil to verify their wishes and feelings and contact the pupil's parents. We will strive where possible to always gain consent where we believe our concerns warrant the sharing of information to statutory services such as Police and Children's Services, However, consent is not a requirement if:

- the pupil would be placed at increased risk of significant harm through the action of gaining consent;

- there would be an impact on a criminal investigation;
- a delay in making the referral would impact on the immediate safety of the pupil.

In any situation where a child or their parent/carer object to consent or particular information sharing and we decide that it is proportionate and in the best interests of the child to do so, a clear rationale, outlining our decisions and the reasons why, will be recorded on CPOMS.

If a child is in immediate danger or at risk of harm a child protection referral will be made to Children's Services and/or the Police immediately. Anyone can make a referral, but the DSL should be informed as soon as possible. The DSL will notify the Headmaster or in his absence the Chair of Governors.

If the initial referral is made by telephone, the DSL will confirm the referral in writing to Children's Services also within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact Children's Services again.

- **Criminal offence:** Where a crime may have been committed a referral should be made to the Police as required.
- **Radicalisation:** In cases where there is a concern of possible risk of radicalisation a referral will be made to the Channel programme through Children's Services.
- **Female Genital Mutilation:** Cases where it is discovered that Female Genital Mutilation appears to have been carried out on a girl under the age of 18 must be reported to the Police. This is a statutory duty placed on all teachers. Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

In borderline cases as to whether a referral should be made, the DSL may consult with appropriate professionals such as the Child Protection School Liaison Officer, the Consultation Hub or the Prevent Lead

If a pupil is not suffering or is not at risk of suffering significant harm but needs additional support from one or more agencies, the DSL will follow local processes to seek Early Help support. Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. If a concern has been raised and an Early Help Assessment is appropriate the DSL will conduct an Early Help Assessment and liaise with other agencies as required. These processes will differ depending on the local authority in which the pupil is registered.

In the following circumstances the DSL will consider taking advice from Children's Services, or the Child Protection School Liaison Officer before a decision about making a referral is made:

- the complaint does not involve a serious criminal offence;
- a referral would be contrary to the wishes of a pupil who is of sufficient maturity and understanding and properly informed, and contrary also to the wishes of the pupil's parents; and
- the case is one that can be satisfactorily investigated and dealt with under the School's internal procedures, the parents being kept fully informed, as appropriate.

However, if during the course of the internal procedures, it appears that the situation is more serious, the DSL will again consider whether a referral should be made.

In other cases the action to be taken will consider:

- the need to follow and contribute to local inter-agency procedures, the three safeguarding partners (HSCP) – the local authority, a clinical commissioning group and the chief officer of police in the local area;
- the nature and seriousness of the suspicion or complaint;
- the wishes of the pupil who has complained, provided that the pupil is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a pupil's wishes;
- the wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose;
- duties of confidentiality, so far as applicable;
- the lawful rights and interests of the School community as a whole including its employees and its insurers.

However, **the overriding consideration will always be what is in the best interests of the child**. Any actions taken to support a pupil must also consider any support appropriate for siblings and the intra-familial situation.

Where the outcome of a referral is not reported to the referring member of staff or the DSL and /or where a pupil's situation does not appear to be improving, the school will follow this up with Children's Services and push for reconsideration where appropriate. The DSL is aware of how to escalate concerns formally with Children's Services.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with Children's Services and the Police.

2.4 Written records and preserving evidence:

A written record must be kept of:

- A clear and comprehensive summary of the concerns raised;
- Details of how the concern was followed up and resolved; and
- A note of any action taken, the decisions reached, the reason for that decision and the outcome.

The school uses a system called CPOMS to record Safeguarding and Child Protection issues. All concerns should be recorded on this confidential, secure, electronic system. Staff are given training on how to use this system.

Other evidence (for example, initial reports, scribbled notes, mobile phones containing text messages, clothing, and computers) and the written note referred to in Section 2.2 above must be safeguarded and preserved. All evidence must be handed to the DSL.

2.5 Confidentiality and sharing information

All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence. Our School understands the lawful basis upon which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

Staff should only discuss concerns with the DSL, DDSLs, Headmaster 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.

The Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) place duties on organisations to process personal information fairly and lawfully and to keep the information they hold safe and secure. However, this does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

All staff will have regard for the Government's publication [Information sharing advice for safeguarding practitioners](#), which includes 7 'golden rules' for sharing information, and the DSL will support staff who have to make decisions about sharing information with all relevant parties. If staff are in any doubt about sharing information, they can seek advice from our Headmaster, DSL or any person in a position of senior leadership or wider DSL team.

2.6 External agencies

If the School decide to share information with, or make a referral to, Children's Services or the Police, the parents and pupil will usually be informed unless to do so could put the pupil at further risk of harm or if they have been instructed to not do so by the external agency. We will be clear with the pupil and parents about what we have shared, with whom, the reasons why and how the information will be used.

If a child or group of children have suffered significant harm or are considered at risk of harm either directly or online, we will have a duty to consider making a referral to Children's Services and the Police if a crime has been committed.

3. MANAGEMENT OF SAFEGUARDING AT ST ALBANS SCHOOL

3.1 The Designated Safeguarding Lead

The School has appointed a senior member of staff with the necessary status and authority to coordinate child protection arrangements, the Designated Safeguarding Lead (DSL). The responsibilities below are in line with Annex C from KCSIE 2025.

The DSL:

- takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online;
- manages the wider safeguarding team of DDSL's to ensure they are promoting the welfare of pupils with safeguarding concerns;
- acts as the main contact in our school when a child and their family are receiving support from the school, external agencies and statutory services;

- provides guidance to parents, pupils and staff about obtaining suitable support online
- acts as a source of support and expertise to the School community;
- has an understanding of relevant safeguarding guidance and HSCP procedures and operates safeguarding procedures in line with locally agreed inter-agency procedures;
- keeps detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions, ensuring that such records are stored securely and are kept separate from the pupil's general file;
- if a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file;
- refers suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Prevent Programme, Disclosure and Barring Service, and/or Police), and supports staff who make such referrals directly;
- attends and/or contributes to strategy discussions, such as Child in Need or Child Protection Conferences;
- takes part in and/or leads early help support, which may include an Early Help Assessment or Team Around the Child/Family (TAC/TAF) meeting;
- has a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school;
- oversees the creation of care plans and risk assessments/support plans to ensure that pupils are kept safe from harm during the school day as far as is practically possible;
- ensures that when a pupil with a safeguarding file leaves the School, their information is promptly passed, ideally within 5 school days, to the DSL at the new school;
- ensures that the Safeguarding policy is updated annually and draws on the expertise of relevant staff when considering the policy and safeguarding arrangements;
- liaises with the Nominated Safeguarding Governor and Headmaster as appropriate;
- ensures a record is kept of staff attendance at safeguarding training;
- liaises with pastoral teams in promoting the welfare of pupils with safeguarding concerns;
- keeps records of low-level concerns, ensuring that records are stored securely;
- keeps the Headmaster informed of all actions unless the Headmaster is the subject of a complaint. In this situation this should be reported to the Chair of Governors;
- liaises with the LADO;
- liaises with the Mental Health Lead where concerns are linked to mental health;
- ensures that cases where a person is dismissed or left due to risk or harm to a child are referred to the Disclosure and Barring Service as required;
- ensures that the DDSLs are appropriately trained and, in the absence of the DSL, are able to carry out those functions necessary to ensure the ongoing safety and protection of pupils;
- familiarises themselves with any safeguarding files for any children joining the School;
- will consider when a pupil is transferring to another school, whether it would be appropriate to share safeguarding related information with the new school in advance of the pupil leaving;
- will promote a culture of listening to children and taking account of their wishes and feelings; and
- ensures that adequate cover arrangements are in place so that the DSL or a Deputy DSL is contactable outside of term-time.

3.2 The Headmaster

The Headmaster:

- ensures that the Safeguarding Policy and procedures are implemented and followed by all staff;

- allocates sufficient time and resources to enable the DSL to carry out their roles effectively, including the assessment and support of pupils and attendance at strategy discussions and other necessary meetings;
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy;
- ensures that pupils are taught about safeguarding through teaching and learning opportunities as part of a broad and balanced curriculum;
- manages cases where there are low-level concerns regarding the conduct of staff, or oversees with delegation to the DSL; and
- manages cases where there is an allegation of abuse made against another member of staff or volunteer.

3.3 The Board of Governors

The Board of Governors nominates a governor to take leadership responsibility for the School's safeguarding arrangements. This Nominated Safeguarding Governor ensures that the School:

- has a DSL for safeguarding who is a member of the Senior Leadership Team who has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place;
- has a DSL with the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support;
- has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff;
- has a Safeguarding policy and procedures that are consistent with statutory and HSCP requirements, reviewed at least annually and made available to parents via the website and on request, that is approved by the Governing Body;
- that this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised;
- reviews safeguarding procedures through an annual review that is overseen by the Nominated Safeguarding Governor working in conjunction with the DSL. A report, which includes an update and review of the effectiveness of procedures and their implementation, is submitted to the Governing Body for its Summer Term meeting for discussion and approval. In addition, termly reviews will be produced by the DSL for the Governing Body, which includes updates on safeguarding procedures and statistics on the number of concerns/referrals.
- has procedures for dealing with allegations of abuse made against members of staff including allegations made against the Headmaster;
- has and implements safer recruitment procedures that include the requirement for statutory checks on staff suitability to work with children;
- ensures that sufficient and relevant staff are trained in safer recruitment processes;
- has a training strategy that ensures all staff, including the Headmaster and Governors, receive safeguarding training, with refresher training at three-yearly intervals as recommended by HSCP. The DSL and Safeguarding Team will receive refresher training at, at least, two-yearly intervals. In addition, all staff members will receive regular safeguarding updates as required but at least annually;
- has an induction process that ensures all temporary staff and volunteers are made aware of the School's arrangements for safeguarding;
- teaches pupils about safeguarding, including online safety;

- where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed
 - make sure there are arrangements for the body to liaise with the School about safeguarding arrangements, where appropriate.

The Board of Governors nominates a member (normally the Chair) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the Headmaster.

4. SIGNS AND FORMS OF ABUSE

4.1 Recognising abuse

Abuse, neglect, exploitation and wider safeguarding issues are rarely standalone events. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. It is important to consider the wider context of any concern.

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation. The definitions in this document are drawn from Part One of 'Keeping Children Safe in Education' (2025).

- **Abuse** - a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.
- **Physical abuse** - a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms, or deliberately induces, illness in a child.
- **Emotional abuse** - the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Domestic abuse** – As outlined in the Domestic Abuse Act 2021. any child witnessing domestic abuse is also a victim of it as witnessing ill treatment of others is harmful to children. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

We are part of Operation Encompass which is a Police and education early intervention safeguarding partnership which supports children and young people who experience

domestic abuse. Police will share information about domestic abuse incidents with us in a timely fashion when they have been called to a domestic incident.

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

Sexual abuse divides into two main categories:

- **sexual violence**, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- **sexual harassment** which can include:
 - sexual comments such as stories, lewd comments, sexual remarks about clothing and appearance, calling someone by sexualised names
 - sexual jokes or taunting
 - physical behaviour such as deliberately brushing against someone, interfering with someone's clothes, displaying pictures, photos or drawings of a sexual nature
 - online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - misogynistic or misandrist comments
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - consensual and non-consensual sharing of nudes and semi-nudes and/or videos (also known as sexting or youth produced sexual imagery);
 - sharing of unwanted explicit content
 - sexualised online bullying
 - sexual exploitation, coercion and threats
 - upskirting (this typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.).

Neglect - the persistent failure to meet a child's basic physical, emotional and/or psychological needs likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born it may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment), protect a child from physical and emotional harm or danger, ensure adequate supervision (including the use of inadequate care-givers) or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. It is important for staff to be aware that neglect can occur in all families, regardless of material circumstances. Staff at this School need to be particularly vigilant to so called 'affluent neglect', which is the emotional or physical neglect

experienced by children within wealthy families, and common indicators include emotional distance, lack of quality time with parents and high academic pressure.

4.2 Other Safeguarding Issues

Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development. It covers situations of manipulation, misuse, abuse, victimization, oppression or ill-treatment. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The victim may have been exploited even if the activity appears consensual.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser;
- **Child Labor Exploitation:** this involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity;
- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities;
- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

Indicators of exploitation may include increased absence from school, a change in friendships or relationships with older groups or individuals, a decline in performance, signs of self-harm or a significant change in wellbeing. Unexplained gifts or new possessions could indicate that they have been approached by or are involved with criminal networks or gangs and may be at risk of criminal exploitation (for example 'County Lines' when drug gangs groom and exploit young people to move, store and sell drugs and money).

Serious Violence. All staff should be aware of the indicators which may signal that children may be at risk from, or could be involved with, serious violent crime. Concerns should be referred to the DSL.

'Honour-based' abuse (including Female Genital Mutilation and Forced Marriage).

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage (age of consent is 18), and practices such as breast ironing. It is a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All

forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Female Genital Mutilation (FGM) or the risk of FGM.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

If a teacher, in the course of their work in the profession discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher has a legal duty to report it to the Police.

Contextual Safeguarding We recognise that Safeguarding incidents and/or behaviour can be associated with factors outside of school and can occur between children outside school. All staff, but especially the DSL will consider the context within which such incidents or behaviour occur. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Prevent and concerns about extremism

As a School we are aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015, to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism”. This duty is known as the Prevent duty.

All staff are aware of the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education. Our staff are aware that pupils may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our school’s safeguarding approach.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

The Prevent Duty is concerned with all forms of terrorism and extremism. It also includes some forms of nonviolent extremism. For example:

- Right Wing extremism
- Religious extremism
- Environmental and Animal Rights extremism
- School Massacre ideology
- Involuntary Celibate (Incel) ideology

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. All staff will consider this possibility in their pastoral work and pass on concerns to the DSL or a DDSL.

Increasingly we see young people with significant mental health challenges, particularly involving possible depression, anxiety, eating disorders and self-harm.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing mental health challenges or be at risk of developing a mental health issue.

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a pupil this should be shared with the pastoral team. If they have a mental health concern and believe that the child is at risk of harm, immediate action should be taken, in accordance with Section 2 of this policy, by speaking to the DSL or a DDSL.

If a child is experiencing symptoms such as low mood, low self-esteem or generalised anxiety then they may be signposted to further support both inside and outside of school. This may include one of the following:

- Visiting the School Counsellor
- Being referred to the Mental Health Support Mentor
- Mentoring (either peer mentoring or external mentoring/coaching)
- Wellbeing screens with the School Nurse

If, however, the child is presenting with a concerning level of low mood and anxiety for a significant period of time then the DSL will discuss with the pupil and their parents/carers to explore options of support. This may include a referral to external agencies, such as CAMHS and/or a visit to the GP.

If a pupil is experiencing suicidal thoughts but they do not need physical input from A&E then consideration will be given to accessing support from their local CAMHS service. If a referral for targeted mental health support is required, then a referral through the CAMHS SPA will be made. Pupils who are considered a risk to themselves will have a care plan and risk assessment

developed. This process will be led by the DSL and Mental Health Lead. This will be shared with their pastoral team and the Head Nurse.

4.3 Who are the abusers?

Abusers can be parents or carers, siblings or members of the extended family, neighbours, teachers, strangers or other pupils; in short, an abuser could be anyone.

4.4 Signs of abuse

The following may help staff be aware of possible signs of abuse but these do not necessarily mean that the child has been abused: Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. Mental health concerns (including self-harm) can be indicators that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. In addition, behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Such concerns can also be indicators that a child needs professional support to help them cope with personal challenges. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

Physical Abuse

- Unexplained injuries/ burns
- Untreated injuries
- Bruises/ abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear
- FGM
- Honour based abuse including FGM and forced marriage

Sexual Abuse

- Knowledge or interest in sexual acts inappropriate to their age.
- Use of sexual language or sexual knowledge that you wouldn't expect them to have.
- Asking others to behave sexually or play sexual games.
- Physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy
- Fear of undressing for gym

Neglect

- Constant hunger, tiredness and/or poor personal hygiene
- Untreated medical problems
- Being unprotected from physical and emotional harm or danger
- Being left with inadequate supervision

Emotional Abuse or Personal Mental Health Challenges

- Depression/withdrawal/persistent low mood
- Changes in behaviour or school performance
- Social isolation
- Self Harm / Eating disorders
- Overreaction to situations or mistakes

- Poor self-esteem
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

Child Sexual Exploitation

- Unexplained gifts or new possessions
- Association with other young people involved in exploitation
- Older boyfriends or girlfriends
- Sexually transmitted infections or become pregnant
- Changes in emotional well-being
- Misuse of drugs and alcohol
- Absent for periods of time or regularly come home late
- Regularly miss school or education or don't take part in education.

4.5 Bullying

While bullying between children is not a separate category of abuse, neglect and exploitation, it is a very serious issue that can cause considerable anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be investigated and managed in line with our anti bullying strategy. The subject of bullying is addressed at regular intervals in PSHEE, in assemblies and through tutors and Heads of Section. The School has an Anti-Bullying Strategy. A bullying incident will be treated as a safeguarding concern if there is reasonable cause to believe the child is suffering or likely to suffer significant harm. No one person works on their own when dealing with a bullying incident and the threshold for referral is discussed in all cases.

4.6 Impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Good practice involves:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour
- recognising that challenging behaviour may be an indicator of abuse, neglect or domestic conflict
- reading and understanding the School's Safeguarding Policy and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact and Data Protection
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language

- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse or mental health challenge.

4.7 Children who may be particularly vulnerable

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At St Albans School we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers or protected characteristics they may have. The School is mindful of its responsibilities under the Human Rights Act (1998), the Equality Act (2010) and the Public Health Sector Equality duty. As stated in the Equality Act (2010), we recognise the protected characteristics that may be applicable to our pupils:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation.

Any child may benefit from early help, but we will be particularly alert to the potential need for early help a child who:

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

This list provides examples of additionally vulnerable groups and is not exhaustive. These additional factors should inform decisions about safeguarding. Any student who is or feels

vulnerable in any way is encouraged to discuss their concerns openly with any member of the safeguarding or pastoral teams.

Children with Special Educational Needs and Disabilities (SEND)

We know who our pupils are with special educational needs, disabilities, or additional health needs and recognise that they may face additional barriers, that can include:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's impairment without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- assumptions that children with SEND can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so;
- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child);
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased;
- a disabled child's understanding of abuse;
- lack of choice/participation.

Children Looked After (CLA) and Children with a Social Worker)

At St Albans School we ensure that appropriate arrangements are in place to support these children as outlined in the Children Looked After Policy. For information the Designated Teacher for CLA pupils is the DSL.

5. ALLEGATIONS OF ABUSE AGAINST STAFF

All School staff are aware that, as outlined in our code of conduct, inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. All staff based within our School will be considered to be in a 'position of trust'. A 'position of trust' refers to any role where an adult holds power or influence over a child due to the nature of their work (either paid or voluntary).

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the School staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent this includes both in-person and online interaction, within or outside of employed/voluntary hours. Furthermore, a sexual relationship with a pupil over the age of 18 is likely to fall within the definition of abuse of a position of trust leading to the most serious disciplinary action.

5.1 Allegations that may meet the harms threshold

An allegation is a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The School will deal with allegations against staff, including supply staff, (and Governors, volunteers who work with children and contractors on site) that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college in accordance with Part Four of KCSIE 2025 and the School's 'Disciplinary Procedure' policy found in the Staff Handbook (with KCSIE 2025 taking precedence where necessary). This will be followed where it is alleged that anyone working in the school, has (this applies to either within or outside the school for the last bullet point):

- behaved in a way that has harmed a child, or may have harmed a child (harm threshold);
- possibly committed a criminal offence against or related to a child (criminal threshold);
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (suitability threshold).

Any information or concern which meets the above threshold should be referred to the LADO service prior to the School taking any action. The School will not undertake its own investigations of an allegation against a member of staff without prior consultation with the LADO, or in the most serious cases the Police, in order not to jeopardise statutory investigations.

In addition, this School policy will be followed if the School is made aware of allegations relating to external hirers of School premises for the purposes of running activities for children (see section 7.4 for more information).

Confidentiality

The School will aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures follow the guidance in Part Four of KCSIE and the school's 'Disciplinary Procedure' policy found in the Staff Handbook.

It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Notwithstanding this we must act on every allegation. 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 who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career.

All staff must remember that the welfare of the child is paramount, and they should therefore not hesitate to raise any concern about the conduct of a colleague with the Headmaster without delay. (See also section below on Low level Concerns)

Any staff member who is aware of anything that may affect his/her suitability to work with children must notify the School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Detailed guidance is given to staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Handbook and is re-printed in Appendix A.

If the School ceases to use the services of a member of staff (or a Governor or volunteer) because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS).

There is a legal duty to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned and failure to refer when the criteria are met is a criminal offence.

Any such incidents will be followed by a review of the safeguarding procedures within the School with a report being presented to the Board of Governors without delay.

For all allegations, other than those found to have been malicious or false, the following information must be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, and decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded
- a copy provided to the person concerned, where agreed by children's social care or the Police
- a declaration on whether the information will be referred to in any future reference.

Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to the Teaching Regulatory Agency (TRA) referral. Reasons for a referral to TRA would include; unacceptable professional conduct, conduct that may bring the profession in disrepute, or a conviction at any time for a relevant offence.

Whilst the School is not the employer of supply teachers, it will ensure allegations against supply teachers are dealt with properly. In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the Local Authority Designated Officer (LADO) to determine a suitable outcome.

If historical allegations of child abuse are made against a former member of staff who is no longer employed by the School, the School will report the matter to the Police. All allegations of historical abuse should be referred to the Head and DSL immediately.

The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

The School is mindful of the importance of making every effort to maintain confidentiality and guard against unwanted publicity while an allegation against a member of staff is being investigated or considered and of the reporting restrictions in the Education Act 2002. See also Part Four of KCISE 2025 on managing allegations made about staff.

5.2 Concerns that do not meet the harm threshold – Low Level Concerns

Sometimes staff, parents or pupils may feel that the behaviour of a member of staff is inappropriate or could be mis-interpreted but does not meet the LADO threshold; these concerns are referred to as low-level concerns. The term low-level does not seek to minimise the seriousness of any concerns as a repeated low-level concern or a pattern of concerns which may not meet the LADO threshold individually may together indicate a concern about the person's suitability and potential risk to children in the capacity of their role.

A low-level concern could be:

- an action that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work;
- an allegation that does not meet the threshold for referral to the LADO;
- being overly friendly with children;
- having favourites;
- taking photographs of children on their mobile phone unless done legitimately for purposes related to their employment in accordance with the School's protocol, e.g. for marketing purposes;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- using inappropriate sexualised, intimidating or offensive language.

Reporting low-level concerns will encourage and embed a culture of openness, trust and transparency in which the expectations of staff conduct, and behaviour is constantly lived, monitored and reinforced by all staff.

Such low-level concerns should be reported to the DSL, who will share this with the Headmaster, or to the Headmaster directly. If a concern involves the DSL, then it should be reported to the Headmaster. The Headmaster will be informed in a timely fashion of all such reports and is the ultimate decision maker in respect of all low-level concerns. Concerns relating to supply staff or contractors will be notified to their employer.

The DSL should collect as much evidence as possible by speaking to the person who raised the concern, the individual involved and any witnesses and based on the evidence collected, decide what further action if any is required.

Records of such concerns, the results of the investigation, any action taken and the rationale for their decision will be held by the DSL securely and confidentially on CPOMS StaffSafe and will be reviewed to identify any potential patterns of concerning, problematic or inappropriate behaviour. Any member of staff may ask the DSL if they appear in these records, however the identity of the initiator will remain confidential as far as reasonably possible. Records will be retained at least until the individual leaves the employment of the School.

In addition, if a member of staff feels that they have found themselves in a situation which could be misinterpreted, or might appear compromising to others, they should self-refer to the DSL or a DDSL so that the event may be recorded appropriately should any concern be raised by a third party.

6. ALLEGATIONS AGAINST PUPILS (CHILD ON CHILD ABUSE)

Safeguarding issues can manifest themselves via child-on-child abuse, which is where children cause harm to other children. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based, including misogyny/misandry and discriminatory bullying);
- racism, which can include verbal abuse, physical attacks, exclusion from activities or opportunities and microaggressions, which can be conscious and unconscious. It can occur in person or online;
- hate incidents, hate crimes and non-crime hate incidents – which may also include an online element;
- abuse in intimate personal relationships between peers (sometimes known as ‘teenage relationship abuse’), which may include an online element;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse); and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Harmful sexual behaviours (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people which is harmful or abusive. It includes:

- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery); and
- upskirting which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

The School has a zero tolerance approach to child-on-child abuse.

All Staff are given training to respond appropriately and manage effectively any report of child-on-child abuse including sexual violence or sexual harassment. They are also made aware of the risk to those accused of such abuse of self-harm and suicide. They should also be aware this can happen inside or outside of school and online.

All staff are expected to:

- challenge inappropriate behaviours;
- make clear that any inappropriate behaviours that are abusive in nature, including sexual violence and sexual harassment, are not acceptable, will never be tolerated and is not an inevitable part of growing up; and

- not tolerate or dismiss inappropriate behaviours as “banter”, “part of growing up”, “just having a laugh” or “boys being boys” as this can lead to a culture of unacceptable behaviours becoming normalised.

The School's initial response to a report from a child is important. It is essential that ALL victims are reassured that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or any form of child-on-child abuse, nor should they ever be made to feel ashamed for making a report. Victims should be given as much control as is reasonably possible in how they want to proceed.

6.1 Managing incidents of sexual violence and sexual harassment between children

In responding to all signs, reports and concerns of child-on-child sexual violence and sexual harassment we will follow the statutory guidance as set out in [Part Five of Keeping Children Safe in Education 2025](#).

Sexual violence and sexual harassment can occur between two children of any age and sex. Sexual violence and sexual harassment behaviours exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. When assessing the level of harm and how to respond to an incident of harmful sexual behaviours (HSB) the DSL will consult the [Hackett's Sexualised Behaviour Continuum](#) to establish whether the behaviour is normal and developmentally expected or inappropriate, problematic, abusive or violent. When considering HSB, both ages and the stages of development of the children are critical factors.

Incidents of sexual violence or harassment outside of school should be treated by schools in the same way as they handle incidents in school. All staff are trained as part of the annual safeguarding training to manage a report which will be passed immediately to the DSL. Victims of such abuse will be offered support through the pastoral care team.

Following a report of sexual violence and/or sexual harassment the school will consider the four likely scenarios as set out in Part Five of KCSIE 2025:

1. **Manage internally** – if the DSL considers that the pupil concerned is not in need of early help or statutory intervention then it may be appropriate to handle the incident internally through utilising the School's Anti-bullying Strategy and Promoting Good Behaviour and Sanctions Policy and providing pastoral support. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decision should be recorded.
2. **Early help** – this means providing support as soon as a problem emerges and can be particularly helpful to address non-violent harmful sexual behaviour and may prevent escalation to sexual violence. Multi agency early help will work best alongside the School's policies and engagement with the Parents. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decision should be recorded.
3. **Referrals to Children's Services** – where a child has been harmed, is at risk of harm, or is in immediate danger the DSL will make a referral to the local Children's Services. Unless there is a compelling reason not to, the DSL will inform the parents. The School will not

wait for the outcome of the social care investigation before protecting the victim and other children but will work alongside and cooperate with the relevant lead social worker to ensure the best support possible is implemented for the victim and, where appropriate, the alleged perpetrator and any other children that require support. If the Children's Service review of the evidence means they do not believe statutory intervention is relevant, but the DSL is still concerned for the safety of the child, the DSL should be prepared to refer again. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decision should be recorded.

4. **Reporting to the Police** – If a potential crime has been committed a report is made to the Police. This will generally be in parallel with a referral to Children's Services. The DSL will follow local processes for referrals. Where a report of rape, assault by penetration or sexual assault is made, the DSL may decide, in consultation with the victim, to pass this on to the Police. Unless there are compelling reasons, the School will inform the Parents. It will still be made clear that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decision should be recorded.

In some cases, the victim may ask the School not to tell anyone about the sexual violence or harassment. Ultimately, the DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

Where there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment for both the victim and alleged perpetrator. This will also be considered for allegations of sexual harassment. In many cases this will involve the creation of a RAMP (Risk Assessment and Management Plan). For sexual behaviour concerns that are deemed exploratory and/or inappropriate a Safety and Support Plan will be used. In the creation of the RAMP, the DSL should consider the needs of:

- the victim(s), especially their protection and support),
- the alleged perpetrator(s),
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms
- The time and location of the incident, and any action required to make the location safer

All decisions and actions taken will be regularly reviewed. Staff will look out for potential patterns of concerning, problematic or inappropriate behaviour.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's Promoting Good Behaviour and Sanctions Policy will apply.

If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate according to the Promoting Good Behaviour and Sanctions Policy. The young person making the allegation will be considered as potentially needing help or may be a victim of abuse and this is a cry for help.

In addition, this School policy will be followed if the School is made aware of allegations relating to external hirers of School premises for the purposes of running activities for children (see section 7.4 for more information).

6.2 Youth Produced Sexual Imagery

The issue of consensual and non-consensual sharing of nudes and semi-nudes and/or videos is an increasing form of child-on-child abuse. In such cases the school will follow the Department of Education advice outlined in [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). All staff are aware of the guidance on searching screening and confiscation of devices and, in particular, the key consideration that they should not view or forward illegal images of a child.

If there is an incident reported of sexting or youth produced sexual imagery, then an immediate referral to Police and/or Children's Services will be made if at any stage there is a concern a young person has been harmed or is at risk of harm. The DSL will make a referral if any of the following five factors are present:

- The incident involves an adult;
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to age or special educational needs);
- The imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts; or
- We believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

However, if none of the above apply the School may decide to respond to the incident without involving the Police or Children's Services but may escalate the incident at any time if further information or concerns come to light.

The School will take advice from Children's Services/and or the Police on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils concerned including the alleged victim and perpetrator.

7. OTHER SAFEGUARDING ISSUES

7.1 Staff training

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff, volunteers and Governors will receive training during their induction that includes familiarisation with the school's Safeguarding Policy and identification of their safeguarding responsibilities. It will include online safety training, their responsibilities on online filtering and monitoring, Prevent awareness training and how to identify young people at risk from radicalisation.

This training should specifically equip Governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Governors should also recognise their role in online safety.

All staff, including the Headmaster, Governors and volunteers will receive appropriate training which is regularly updated. Registers of attendance for all face-to-face training are kept by the DSL. Registers for online safeguarding training are kept by the Human Resources department.

The DSL will receive training updated at least every two years, including training in inter-agency procedures and safety online. The DDSLs will receive training to the same standard as the DSL which will also be updated at least every two years.

All new staff will be given induction training and teaching staff will complete a Level 1 Safeguarding course. In addition, they will be provided with the School's Safeguarding Policy (including the School's response to children who are absent from education), the Promoting Good Behaviour and Sanctions Policy, and the Staff Code of Professional Conduct Policy. Other policies that are explained in induction training include the School's Anti-Bullying Strategy, the Policy for the use of Force to Control or Restrain pupils. They are further provided with online safety training and training on the identity and role of the DSL and DDSLs and a copy of Part One of KCSIE 2025 (including Appendix B) and Part Two for Governors, which they must confirm in writing that they have read and understood.

In addition, all school leaders and staff who work directly with children must read Part One and Appendix B of KCSIE (2025).

In addition, all staff members will also receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard pupils effectively. Staff are not expected to act as mental health experts and should not try to diagnose conditions.

7.2 Safer recruitment

Our school endeavours to ensure that we do our utmost to employ 'safe' staff by following all relevant regulations, guidance and recommendations including:

- Department for Education (DfE) KCSIE (2025);
- Disqualification under the Childcare Act 2006 (DUCA);

- Prevent Duty Guidance for England and Wales 2023
- Department for Education (DfE) regulatory requirements part 4 'Suitability of Staff, Supply Staff, and Proprietors' which reflect the 'Independent School Standards Regulations' (ISSRs)
- Disclosure and Barring Service (DBS) code of conduct and other guidance
- Right to work in the UK Home Office guidance.

Rigorous safer recruitment procedures are carried out on all staff (employed and contracted workers and volunteers in 'regulated activity') at the school including all necessary safer recruitment pre-employment checks including (not all checks listed below are applicable for all categories of staff, please refer to the full Recruitment and Selection Policy at Appendix B):

- a completed School Application Form;
- a suitability to work with children self-declaration form prior to interview so that information can be considered and discussed at interview;
- an online search on all shortlisted candidates prior to interview so that results may be considered and discussed at interview;
- undergoing a formal interview process, to review work history, explore gaps in work history, discuss experience and skills, where at least one of the persons who conducts the interview has completed safer recruitment training;
- evidence of identity, address and qualifications;
- two satisfactory references, one of which should be from the applicant's most previous employer and comment on the applicant's suitability to work with children;
- where the role relates to 'regulated activity' an appropriately dated Enhanced DBS Certificate (including Children's barred List check), or permission to carry out an online Enhanced DBS check (including Children's Barred List check), to include suitability to work in a School under section 142 of the Education Act 2002, the results of which the School deems to be satisfactory;
- evidence of right to work in the UK;
- relevant overseas checks, including, where available and appropriate to the role, an overseas DBS equivalent, police/criminal check, certificate of good conduct, confirmation of professional standing, confirmation from a regulator of the teaching profession in another country that the candidate is not the subject of a sanction rendering them unable or unsuitable to work in a school (for those that have taught overseas), and additional references if the candidate has lived overseas during their adult life;
- a completed medical questionnaire to assess the candidate's physical and mental fitness for the role and to work in a school;
- satisfactory TRA checks for teaching prohibition orders (teachers and others who have been prohibited from teaching);
- satisfactory TRA check for any sanctions or restrictions (that remain current) imposed by the General Teaching Council for Education (GTCE) before it was abolished in 2012;
- verification, via the TRA, of qualified teacher status (QTS), awards and satisfactory completion of teacher induction and/or teacher probation;
- either via the TRA or via the DBS, a satisfactory S.128 check (for a direction made by the Secretary of State under S.128 of the Education and Skills Act 2008 barring individuals from taking part in the management of an independent school);
- a satisfactory HMRC 'fit and proper person' check;
- charity trustee and associated senior manager disqualification checks pertaining to the Charities Act 2011.

7.3 Site security

Visitors to the School, including contractors (other than those working exclusively out of term time), are identified on arrival, asked to sign in and are given a badge on a red lanyard, which confirms they have permission to be on site and identifies them to members of staff and pupils. They will be accompanied at all times whilst on site.

Where an event is taking place within School operating hours which brings in large numbers of visitors who cannot be individually escorted, the School will review the arrangements and determine the appropriate level of supervision, depending on the circumstances.

Contractors engaging in regulated activity will require full and appropriate safer recruitment checks including an enhanced DBS certificate (including barred list check). These contractors receive Safeguarding Induction training, will be aware who the DSL and Deputy DSLs are and will be given contact information. Having completed these checks they do not need to be supervised when on site. All other contractors who are not engaging in regulated activity will be supervised at all time whilst on site.

The School is based on a city-centre site with extensive movements of people on and off site each day. It continues to improve its security through appropriate use of human, physical and electronic measures, encouraging a culture where security is seen as important and unidentified persons on site are noted and challenged as appropriate.

7.4 Extended services and off-site arrangements

Where extended school activities are provided by and managed by the School, our own Safeguarding Policy and procedures apply.

If other organisations use the premises for the purposes of running activities with children we will check that they have appropriate safeguarding and child protection policies and procedures in place, including safer recruitment procedures. This includes ensuring that the provider has an appropriate person in place (their DSL) who will liaise with the Safeguarding team at the School regarding any safeguarding concerns raised when using the premises and the School will manage this in line with our own Safeguarding Policy and procedures and will liaise with the LADO where required.

When organising work experience placements our school will ensure that policies and procedures are in place to protect children from harm. We will consider the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.

7.5 Photography and images

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

- ensure that photographs or video recordings taken and used for the purposes of promoting the school and putting on the school website conform to our parental contract;
- ensure pupils are appropriately dressed;
- encourage pupils to tell us if they are worried about any photographs that are taken of them.

7.7 Online Safety

Technology is a pervasive part of our pupil's lives and is also a significant component in many safeguarding and wellbeing issues. There are dangers involved with technology and pupils may be placing themselves at risk. The School's IT Use Policy Pupils, IT Use Policy Staff and Acceptable Use of Mobile Devices policy explains how we try to keep pupils safe in School.

As part of this we have robust filtering and monitoring systems to limit children's exposure to the four key categories of risk categories of risk as identified in Keeping Children Safe in Education 2025:

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

The DSL takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes we have in place, alongside their safeguarding and child protection duties. The DSL works closely with the Director of IT in ensuring that our filtering and monitoring software, Securly, is effective in limiting children's exposure to online risk without unreasonably impacting teaching and learning. Further details on how we meet the filtering and monitoring standards can be found in the document Meeting the Filtering and Monitoring Standards at St Albans. In addition, we conduct a Filtering and Monitoring Annual Review, which is shared with the Governing Body on an annual basis.

The internet is filtered to avoid pornographic, racist, sexist, terrorist, extremist and other undesirable websites. However, it is the pupils' responsibility not to try to gain access to such sites.

In addition, pupils are made aware that that their communications and activities undertaken on the internet can and will be monitored via our filtering and monitoring software and followed up by the pastoral/safeguarding team as appropriate. Cyber-bullying by pupils, via messages and emails, will be treated as seriously as any other type of bullying and will be managed through our disciplinary procedures.

To address the risks, we educate our pupils about online safety through our PSHEE programme. Pupils are made aware of the dangers associated with Internet use (viruses/malware, phishing, exploitation, unreliable sources) and how to keep themselves and others safe when online

Staff are also trained in online safety on a regular basis, and they have an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. In

addition, they are made aware of their responsibilities in conducting themselves online as set out in the Staff Code of Conduct and IT Use Policy Staff.

Mobile Phones

First – Fifth Forms: If a pupil chooses to bring a mobile phone in to School, it should be turned off and locked in their Yondr pouch at all times when on the school site. In the case of an emergency, where a pupil needs to contact home urgently, they should speak to their Head of Section or the Second Master or go to Reception.

For more senior pupils mobile phones may only be used in timetabled lessons with explicit permission from the teacher.

All pupils have access to School WiFi and sign up to the Securly certificate to gain access to the internet. They must use it rather than 3G/4G/5G or VPN's in order for the school to more easily monitor and regulate online activity.

7.8 Radicalisation and extremism

We understand the need to prevent people from being radicalised or drawn into terrorism.

The government defines extremism as the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic right; or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

Some children are at risk of being **radicalised**. Radicalisation is the process by which a person comes to support terrorism and extremist ideologies. Islamic extremism is the most widely publicised form, but schools should also remain alert to the risk of radicalisation into white supremacy extremism.

School staff receive training to help to identify signs of extremism and report concerns where these arise to the DSL or DDSLs. The DSL will follow advice as set out in The Prevent Duty Guidance: for England and Wales (March 2023).

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools.

The School aims to protect and safeguard pupils at risk of radicalisation and staff are alert to, and assess the risk of, pupils being drawn into terrorism and extremist ideology. We encourage healthy debate and discussion of issues at age-appropriate levels and in various areas, not just PSHEE, and we promote a tolerant, respectful culture across the School.

Staff use their professional judgment to identify pupils who might be at risk of radicalisation and will share that with the DSL who will refer the issue to the local Children's Services/Local Safeguarding Partner Arrangements and the local Prevent Coordinator and/or Channel Panel, a

programme focussing on early support for a child or young person identified as being susceptible to being drawn into terrorism or radicalisation.

The School will co-operate and work with local authorities, local Safeguarding Partner Arrangements and the Police, and maintain records in accordance with safeguarding procedures.

7.9 Helping children to keep themselves safe

Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education lessons and through all aspects of School life. Our approach is designed to help children to think about risks they may encounter and with staff work out how those risks might be overcome. Discussions about 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 e-safety and tackling bullying procedures. The School continually promotes an ethos of respect for children, and pupils are encouraged to speak to a member of staff in confidence about any worries they may have.

7.10 Children absent, or missing from education

As a School we follow the statutory guidance on managing school attendance as set out in [Working together to improve school attendance](#). All schools must inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more. Attendance, absence and exclusions are closely monitored.

Staff are aware that a child absent from education is potentially a safeguarding concern and could be a sign of abuse or neglect. This may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Staff are alert to patterns of regular absence and will alert the DSL in line with other potential safeguarding concerns. As a School we will work with Local Authority Children's Services where school absence indicates safeguarding concerns.

In addition, the School, where reasonably possible, will hold more than one emergency contact number for each pupil.

The Second Master will review any unauthorised absences and follow up with pastoral staff to ensure that attendance is closely monitored and regular absence is followed up in the best interests of the child. The Local Authority will be informed when a pupil is removed from the school roll at standard and non-standard transition points during the school year.

If the absence is due to medical reasons the DSL could contact Education Support for Medical Absences (ESMA) for advice and support.

Staff must be alert to signs of children at risk of travelling to conflict zones, Female Genital Mutilation and Forced Marriage.

7.11 Support for those involved in a safeguarding issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support pupils and their families by:

- Taking all suspicions and disclosures seriously;
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- Storing records securely;
- Offering details of helplines, counselling or other avenues of external support; and
- Co-operating fully with relevant statutory agencies.

We will support staff involved by offering Safeguarding Supervision through the Deputy Head – Staff. In addition, all Heads of Section will be expected to offer supervision opportunities to their pastoral teams.

7.12 Host Families

The School's Host Family Policy details arrangements both for our pupils who are staying with Host families and our families who our hosting visitors. A copy of this policy can be found in the Staff Handbook. The welfare of our pupils in these arrangements is of central importance.

7.13 Whistleblowing

If staff have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm will be dealt with the School's Disciplinary Procedures (see Section 5 above).

There will be no disciplinary action taken against a member of staff for making such a report provided it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school or feels that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistle blowing helpline 'What you can do to report abuse' which is available by calling 0800 028 0285 or by Email at help@nspcc.org.uk.

7.14 Protecting others who come into contact with the School

As a Charity we recognise that in addition to our safeguarding duty in respect of our pupils we also have a wider duty to ensure that others who come into contact with the School do not, as a result, suffer harm. All Governors, staff and volunteers should immediately alert a member of the Senior leadership team if they suspect that there is a risk of someone suffering harm as a result of their contact with the School.

Appendix A

Code of Professional Conduct

All members of staff (which, for the purposes of this document, includes contractors and volunteers) are expected to set high personal standards in every aspect of their school life and to regard all fellow staff of the School as colleagues. Colleagues should treat pupils and each other with respect and courtesy. All members of staff have an important role to play in insisting and ensuring that all pupils adhere to the School Regulations and that School policies are conformed to and upheld. It is important that all staff familiarise themselves with this code, and they understand the need to act as positive role models for pupils and to model School Values in everything they do.

Whilst employed by the School, all members of staff should maintain professional and responsible standards of conduct. In particular, it is expected that staff should:

- Observe contract of employment terms and conditions;
- Ensure that every pupil feels safe and protected from any form of abuse and actively commit to safeguarding and promoting the welfare of children and young people;
- Ensure that the Code of Professional Conduct is understood and followed;
- Observe all other policies and procedures included in the Staff Handbook, within individual departments, held elsewhere or notified to staff from time to time;
- Comply with all reasonable advice given by more senior members staff;
- Act at all times in good faith and in the best interests of the School, its pupils, parents, guardians or carers and staff;
- Uphold public trust in the profession and maintain high standards of ethics and behaviour; and
- Having an understanding of, and always act within, the statutory frameworks which set out professional duties/responsibilities and the duties/responsibilities of working with children and/or in a school.

If an employee is found to have breached the Code of Professional Conduct, it should be expected that the School will act in accordance with the Disciplinary Procedure policy and/or the Grievance Procedure policy. Contractors and volunteers in breach of this Code will have their agreements reviewed.

All members of Staff are expected to maintain standards of dress and appearance consistent with the ethos and image of the School as a whole. The dress code for all staff is 'business professional'. Teaching colleagues' standard of dress and appearance should be no less formal or conventional than that expected of Sixth Form pupils in any given context. PE staff and staff taking games sessions should be dressed in accordance with their profession in School endorsed sportswear with the School logo. Support staff are expected to wear formal, smart business/office attire unless their role requires a uniform or other- role-specific clothing. As a guide, please see the following, which is not an exhaustive list of expectations:

- Suits or smart separates

- Smart formal structured shoes (no trainers, trainer style shoes/pumps, flip flops or sliders)
- No denim, leggings, shorts, t-shirts or vest tops
- Clothing should not be too tight or revealing
- Clothing should not be un-ironed, wrinkled, torn, dirty or frayed
- Hair should be well groomed, conventionally styled and coloured
- Earrings and other accessories should be conventional and not excessive
- Face piercings and visible tattoos should not be excessive, and staff may be asked to remove or cover them

The dress code is relaxed to 'smart casual' during School holiday periods but staff are reminded that visitors may be on site and meetings continue to take place so staff should be appropriately dressed. As a guide jeans and smart shorts are acceptable. T-shirts may be worn but not with slogans or symbols that might cause offence.

St Albans School is a no-smoking site, and members of staff are expected not to smoke (including e-cigarettes) in front of pupils during any School-related activity. Members of staff should be aware of their position as role models at School functions when alcohol is being drunk (please see both the **Alcohol Policy** and the **Health and Safety Policy** section on Alcohol).

All staff must familiarise themselves with the School's **Promoting Good Behaviour and Sanctions Policy**. Teaching/coaching staff should arrive promptly for lessons, should avoid leaving a class unsupervised, except in an emergency and should not dismiss pupils early other than in exceptional circumstances. The same principles of responsibility for supervision apply outside the classroom context at all times when staff are *in loco parentis*.

During any professional meeting staff should ensure they arrive before the published start time and that all their mobile devices are on silent. Such devices should not be used for anything other than accessing documents needed for that particular meeting.

Staff should familiarise themselves with the **IT USE POLICY - STAFF** and note that in particular while every effort will be made to respect the privacy of the individual, it is sometimes necessary (and the School reserves the right) to monitor the use of the network or examine the content of user data files particularly where misuse or damage is suspected. The Internet connection is filtered to avoid pornographic, racist, sexist and other undesirable sites. However, it is colleagues' responsibility not to try to gain access to such sites and if accidentally found they should be reported at once to a member of Network Support.

Personal data relating to pupils and staff must be safeguarded with extreme care, whether in hard copy or digital form. If stored on laptops or portable storage devices, it must be secure (e.g. password protected) and where possible encrypted. Personal data and the principles required for protection of personal data are defined by the Data Protection Act 2018. Further guidance and Policy, which staff must be familiar with, can be found in the **Data Protection Policy** and **Information Security Policy** in the Staff Handbook. Examples of personal data include an

individual's mental or physical health, examination results, school reports, safeguarding file, disciplinary records, Learning Support file, religious or political beliefs, biometrics, or financial. Personal data must be shared securely, using shared areas (e.g. SharePoint) or password protecting files.

In accordance with the School's **Safeguarding Policy** (with which all colleagues must familiarise themselves with alongside KCSIE), all staff share responsibility for safeguarding and promoting the welfare of children, including protecting pupils from the risks of terrorism and radicalisation. Staff have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. In this context, staff should have regard to the following guidance, which is intended equally to help staff avoid placing themselves either in compromising situations or, worse, at the mercy of malicious accusations:

- In their dealings with pupils and colleagues, staff should maintain an appropriately professional tone and propriety of language. Case law suggests that, depending on context, the use of language that is threatening, aggressive, obscene, suggestive or calculated to ridicule or humiliate can be deemed to constitute abuse. Staff should not use language which is discriminatory and demeaning in relation to gender, religion, ethnicity, sexual orientation, disability or age. Staff must not make comments to or about pupils which could be taken to have sexual overtones nor should they tolerate debate or discussion between pupils which could be interpreted as such. It is recognised that in order to discharge particular pastoral responsibilities that staff may need to engage in conversation with pupils which cover sensitive matters and they must use their judgement to ensure that the conversation is professional at all times.
- Deliberate physical contact with pupils (either directly or by asking other adults or pupils to do so on their behalf) should, in general, be avoided. There will be, however, occasions in which physical contact is a normal and appropriate part of the teaching situation and particular subjects in which it may be both more common and essential, e.g. to demonstrate correct technique in PE, Drama, Design Technology etc. In these circumstances it is good practice to explain clearly beforehand the purpose of the contact. See also **Policy for the Use of Force to Control or Restrain Pupils** which will clarify the force permitted to prevent a pupil from committing a criminal offence, injuring themselves or others, causing damage to property or disrupting good order and discipline. This might involve staff interposing between pupils, blocking a pupil's path, holding, pushing, pulling or leading a pupil by the arm or using more restrictive hold in extreme circumstances. If such circumstances arise, then the member of staff should inform the Second Master as soon as practically possible (with a brief report of the incident and action taken) who will ensure that parents are contacted.
- Staff should maintain a professional distance in their relationships with pupils. This is particularly important on tours and trips where the informality of the atmosphere could otherwise lead to misjudgements. Staff should not arrange to meet with pupils outside school unless on official school business and this has been discussed and agreed with the Second Master in advance; this includes visiting a pupil's home for any reason.
- Staff must adhere to the School's guidance in respect of additional working, e.g. tutoring, ensuring that Headmaster's consent is obtained before undertaking any additional work (paid or unpaid).

- Staff should not disclose to pupils any details of their home address, personal e-mail addresses, mobile telephone number or home telephone number. Staff should instead use their school e-mail address and a school mobile if needed (e.g. during a school trip).
- Staff should not disclose to pupils any details of their own personal and/or private circumstances beyond what is appropriate and/or useful in a professional pedagogical context.
- If a member of staff becomes aware of a pupil's infatuation or has concerns about the interest a pupil is showing in them personally, they should discuss this with the Second Master or DSL.
- Remember that parents, pupils and prospective employers could access your personal profile and information on a social networking site; you should not post anything that you would not want these people to access (regardless of privacy setting).
- Social networking sites may expose you to the risk of unsolicited advances; it is important that you review your security settings regularly. It is recommended that you are wary of any unsolicited contacts, as these may include pupils. Additional guidance can be obtained from the professional organisations (unions, etc.) if required. Staff must not 'befriend', or otherwise be in contact with, current pupils on personal social media accounts or in the 12 months following their completion at the School.
- Whenever possible, staff should avoid being on their own with individual pupils in any room that does not have a window through which they are clearly visible to passers-by. If this is absolutely unavoidable, the door should be left open. In any one-to-one meetings with a pupil staff should aim to have a desk between the staff member and the pupil and ensure a colleague is aware of the meeting.
- Staff should ensure that their supervision of pupils in changing rooms ensures that pupils are given appropriate respect and privacy.
- Staff should be aware of the Safeguarding issues involved in taking, storing and sharing images of pupils (please refer to **Photography and Sharing Images Guidance** in the Staff handbook).
- Staff should avoid taking only one pupil on their own in a car and ask the Second Master in advance if they need to transport any pupil in a car.
- Similarly, whenever possible, staff should avoid being alone with an individual pupil in a vehicle. In circumstances where this cannot be avoided, e.g. in an emergency, it is good practice to make certain that another colleague is aware of the situation.
- Accepting a gift is not prohibited but certain requirements need to be met as outlined in the **Anti-Corruption and Bribery Policy**. Staff should read this in its entirety before accepting a gift at work, if staff are in any doubt they should consult with the Bursar.
- It is a criminal offence for a member of staff to have a sexual relationship with a pupil of any age. The School will regard any such relationship as gross misconduct which would most likely give rise to termination of the staff member's contract of employment/volunteer or contractor agreement.
- Staff must respect the privacy of pupils, parents and colleagues and must not pass on information about, for example, addresses or telephone numbers to others without gaining prior permission from the person concerned.
- Data about pupils, e.g. about performance in internal examinations, should only be shared with that particular pupil and the pupil's parents in line with the School's requirement to

provide a progress report to parents. For further guidance please refer to ***Sharing Data with Parents – Guidance*** available in the Data Protection folder in General Staff Resources on the K Drive.

- A pupil's public examination grades and marks are the pupil's data, and therefore must only be shared with their parent(s) if written consent from the pupil is obtained. A pupil's examination result should not be shared publicly, e.g. displayed, without written consent from the pupil.
- Contact with, or response to, the media should be done by the Director of Marketing, Admissions and Communications or the Headmaster. Staff should only do so with the explicit consent of the Headmaster.
- Staff must take care to ensure that information displayed on the screen of their computer, for example emails or pupil data, is not displayed to other pupils, either by direct sight or projected onto a screen (e.g. via Airtame)
- Misconduct of a serious kind out of school might be deemed to infringe this code of conduct and could lead to disciplinary action or review of a contractor/volunteer agreement. For example, use of illegal drugs or overt drunkenness in public, especially if witnessed by pupils or others that could associate the behaviour with the School, or that led to an arrest, would fall into this category. Staff who find themselves in the same pub or night club as Sixth Formers need to be particularly aware of the danger of their being compromised. Again, tours and trips present particular dangers in this regard.

All staff have a responsibility not only for observing, but for helping to maintain this code of conduct and should not, from a misplaced sense of loyalty, fail to report a serious breach to a member of Senior Leadership Team. This includes reporting any 'low-level' concerns as set out and explained in the School's Safeguarding Policy to create and embed a culture of openness, trust and transparency at the School.

All members of staff should be able to raise concerns internally and in a confidential fashion about fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations, inappropriate behaviour or unethical conduct. Please refer to the ***School's Whistleblowing Policy*** for further details.

Appendix B: Recruitment and Selection Policy

1. Introduction

St Albans School ("the School") is committed to providing the best possible care and education to its pupils and to safeguarding and promoting the welfare of children and young people. The School recognises that, in order to achieve this, it is of fundamental importance to attract, recruit and retain staff of the highest calibre who share this commitment.

Our commitment is also to an equitable, diverse and inclusive School, with a supportive and flexible working environment for its members of staff. The School recognises the benefits of having a diverse and representative School community who value one another and the contributions everyone is able to make and encourages applicants from diverse backgrounds.

The aims of the School's recruitment policy are as follows:

- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equitably and consistently;
- to ensure that no job applicant is treated unfairly on any grounds including age, sex or sexual orientation, marital or civil partnership status, gender re-assignment, race, colour, nationality, cultural, ethnic, linguistic or national origins, disability, religion or religious belief and pregnancy and maternity (defined by the Equality Act as **protected characteristics**) or on any other grounds relating to employment discrimination legislation including, but not limited to, part time or fixed term employment rights;
- to ensure compliance with ALL relevant regulations, recommendations and guidance including:
 - the Department for Education's (DfE) Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2025) (KCSIE);
 - Disqualification under the Childcare Act 2006 (DUCA);
 - the Prevent Duty Guidance for England and Wales;
 - Education (Independent School Standards) Regulations 2014 (ISSRs);
 - any guidance or code of practice published by the Disclosure and Barring Service (DBS);
 - the Home Office in respect of Immigration and right to work in the UK regulations;
- to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

The managers involved in leading the interviewing, recruitment and selection of new staff have completed accredited Safer Recruitment in Education training in line with the DfE's Keeping Children Safe in Education guidance (2025). All employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.

2. Data Protection

The School is legally required to carry out the pre-appointment checks detailed in this procedure. Staff and prospective staff will be required to provide certain information to the School to enable the School to carry out the checks that are applicable to their role. The School will also be required to provide certain information to third parties, such as the Disclosure and Barring Service and the Teaching Regulation Agency. Failure to provide requested information may result in the School not being able to meet its employment, safeguarding or legal obligations. The School will process personal information in accordance with its Workforce Privacy Notice.

3. Recruitment & selection procedure

Recruitment needs are authorised by the Head and/or the Bursar. Job descriptions and/or specifications and competencies required for a post are identified prior to any active recruitment by the recruiting manager (usually by the Head for teaching posts and the Department Manager for support staff posts assisted by the Head of HR). From this the HR department will create and publicise the job vacancy advertisement.

Vacancy advertisements are placed on the school's recruitment platform My New Term and if appropriate in professional publications appropriate to the role and profession and/or local/national press. Recruitment agencies may also be used to aid the process and to ensure a suitable and diverse field of candidates. When working with recruitment agencies agreed terms and conditions of operation are agreed prior to any role being advertised.

All applicants for employment will be required to complete an **application form** via the My New Term platform containing questions about their academic and employment history and their suitability for the role. Should there be any gaps in academic or employment history, a satisfactory explanation must be provided. If desired the applicant may submit a curriculum vitae in addition to the application form but a curriculum vitae will not be accepted in place of a completed application form.

Applicants will receive a job description and/or a person specification for the role applied for. Application forms, job description/person specifications, this policy along with the School's Safeguarding Policy and Disclosure Policy are available as part of the application process.

At least two members of staff carry out the shortlisting exercise following which applicants may then be invited to attend a **formal interview** at which their relevant skills and experience will be discussed in more detail. All shortlisted applicants will be tested at

interview about their suitability to work with children. All shortlisted candidates will be required to complete a self-declaration form prior to interview in which they will be asked to provide information about their criminal records history and other factors relevant to their suitability to work with children. This information will be considered and discussed with applicants at interview.

Prior to the final interview an online search will be carried out as part of the School's due diligence on shortlisted candidates (see section 4 for further information). This helps to identify any incidents or issues that may have happened, and are publicly available online, which the School may want to discuss with candidates at interview. Checks will only be made and recorded by members of the HR department. Checks made in this regard are only for checking suitability for working with children and not other areas of an applicant's life.

The interview also provides the candidate with an opportunity to find out more about the position and the School. The following principles are applied during the interview process:

- interview criteria (stated or implied) and interview questions are monitored to ensure they do not discriminate, either directly or indirectly;
- interview questions are defined based on necessary competencies including knowledge, skills, experience, attitudes and observable behaviours (the range of competencies may vary dependent on the role);
- interview facilities and arrangements take account of the needs of disabled candidates;
- all selection methods are regularly reviewed to ensure effectiveness, reliability and compliance with current legislation;

Interviewers receive guidance on current relevant legislation and interviewing best practice. All stages of the recruitment and selection process, including interviews, are monitored to ensure that there is no discriminatory treatment. We aim to maintain fair recruitment procedures and policies, open to all and work to minimise unconscious bias.

Specific stages of an interview process may vary dependent on the post. Unpromoted teaching posts include an interview with the Headmaster (covering questions and discussion on motivation to join St Albans School, relevant experience, skills and demonstrated competencies as defined for the role and safeguarding, and questions relating to Safeguarding, Prevent and Fundamental British Values), an interview with the Deputy Head – Teaching and Learning and Head of Department (covering subject knowledge, interest in subject and pedagogy) and an interview with the Second Master (covering pastoral and co-curricular experience and related skills).

All teaching post interviews will include an observed lesson where classroom-based teaching competencies are assessed and candidates' interaction with pupils is observed in an appropriately supervised way. Variations to this process may apply for the appointment of promoted staff for example, for a Head of Department post the Deputy Head – Teaching and Learning would be included in observing the lesson.

Support Staff candidates are interviewed by the Head of Department (in some cases this is the Head) and the Head of HR, and cover motivation to join St Albans School, relevant experience, skills and demonstrated competencies as defined for the role and Safeguarding, Prevent and Fundamental British Values related questions. The interview process for some support staff posts may also include practical tests (including, for example, IT/technical skill tests and/or tests for other specific role related competencies).

Where possible candidates receive a tour of the School during the interview process.

An interview debrief is held following the interview process where candidate interview performance is discussed. This includes assessment of interview evidence against selection criteria, defined role related competencies covering areas of demonstrated skills and experience, attitude and motivation and observable behaviours. This informs the Head's selection decision for teaching posts or the Department Manager's selection decision for support staff posts.

If the School decides to make an **offer of employment** following the formal interview/s, any such offer will be conditional on the following:

- the agreement of a mutually acceptable start date and the signing of an offer letter summarising the main terms and conditions of employment
- verification of the applicant's identity (where that has not previously been verified);
- verification of qualifications, whether professional or otherwise, which the School takes into account in making the appointment decision, or which are referred to in the application form, whether a requirement for the role or not
- verification of the applicant's employment history
- the School being satisfied that any information generated through online searches does not make the applicant unsuitable to work at the School
- receipt of two references (one of which must be from the applicant's most recent employer) which the School considers satisfactory
- for positions which involved 'teaching work, information about whether the applicant has ever been referred to, or is the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency which renders them unable or unsuitable to work at the School
- for applicants who have carried out teaching work outside the UK, information about whether the applicant has ever been referred to, or is the subject of a sanction issued by a regulator of the teaching profession in any other country which renders them unable or unsuitable to work at the School
- where the position amounts to 'regulated activity' (see section 4.4.2 below) the receipt of an enhanced disclosure from the Disclosure and Barring Service with which the School consider to be satisfactory

- where the position amounts to 'regulated activity' (see section 4.4.2 below)
confirmation that the applicant is not named on the Children's Barred List*
*The School is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The School is required to carry out an enhanced DBS check for all staff, supply staff and Governors who will be engaging in regulated activity. However, the School can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently. Whether a position amounts to "regulated activity" must therefore be considered by the School in order to decide which checks are appropriate. It is however likely that in nearly all cases the School will be able to carry out an enhanced DBS check and a Children's Barred List check.
- information about whether the applicant has ever been subject to a direction under section 142 of the Education Act 2002 which renders them unable or unsuitable to work at the School
- verification of the applicant's medical fitness for the role (see section 5.8 below)
- verification of the applicant's right to work in the UK
- for management positions information about whether the applicant has ever been referred to the Department for Education, or is the subject of a direction under section 128 of the Education and Skills Act 2008 which renders them unable or unsuitable to work at the School
- confirmation that the applicant is not disqualified from acting as a trustee / governor or senior manager of a charity under the Charities Act 2011 (see section 5.7 below)
- any further checks which the School decides are necessary as a result of the applicant having lived or worked outside of the UK which may include an overseas criminal records check, certificate of good conduct or professional references.

4. Artificial Intelligence

The School does not use artificial intelligence software as a decision making tool at any stage of the recruitment process, including in respect of external and internal applications and promotion proposals.

5. Pre-employment checks

In accordance with the recommendations set out in KCSIE, DUCA and the requirements of the ISSRs the School carries out a number of pre-employment checks in respect of all prospective staff. The definition of 'staff' includes employed workers (permanent, temporary and casual), contracted (self-employed) workers, company contracted workers (including supply staff) and volunteers in regulated activity.

In fulfilling its obligations to carry out pre-employment checks the School does not discriminate on the grounds of age, sex or sexual orientation, marital or civil partnership status, gender re-assignment, race, colour, nationality, cultural, ethnic, linguistic or national origins, disability, religion or religious belief and pregnancy and maternity (defined by the Equality Act as **protected characteristics**) or on any other grounds relating to employment discrimination legislation including, but not limited to, part time or fixed term employment rights;

5.1 Online searches

In addition to the checks set out below, the School reserves the right to obtain such formal or informal background information about an applicant as is reasonable in the circumstances to determine whether they are suitable to work at the School. In accordance with paragraph 226 of KCSIE this will include online searches on shortlisted candidates (online searches). The online searches the School carries out may include searches of internet search engines, websites and publicly available social media accounts. Applicants are not required to provide account passwords or to grant the School access to social media or professional networking account content that is not publicly available. However, if information (such as profile pictures and/or account bios) is publicly available when a social media or professional networking site account is locked and can therefore be viewed by the School, it may be taken into account as part of the online search.

Online searches will be carried out on shortlisted candidates, prior to interview (or final interview if there are more than one interview). The School will not carry out online searches as part of its initial sift of applications.

The School will determine how it approaches online searches on a case-by-case basis. However, all applicants for a role at the School will be treated consistently with regard to online searches.

Wherever possible online searches will be undertaken by a member of the HR department who will play no other part in the recruitment process (including the shortlisting exercise) or the appointment decision. In carrying out online searches the School is looking for any publicly available information about an applicant that:

- may be relevant to their suitability to carry out the role for which they have applied;
- may be relevant to their suitability to work at the School or in an education setting;
- is of a safeguarding nature; and/or
- may have a negative impact on the School's reputation.

Any information generated from online searches will be entered in an 'online search results record'. Where online searches are undertaken on shortlisted applicants any relevant information generated will be provided to the interview panel for discussion with shortlisted applicants at interview. Where online searches are undertaken on the successful applicant only any relevant information generated will be discussed prior to

employment commencing. All offers of employment will be conditional upon the School being satisfied that the successful applicant is suitable to work at the School in light of any information generated from online searches.

In evaluating any online information for relevance the School will use the following criteria:

- whether the information is relevant to the position applied for;
- whether the information is relevant to the applicant's suitability to work at the School or in an education setting;
- whether the information could have an impact on the School's reputation (whether positive or negative);
- whether the information calls into doubt the applicant's willingness or ability to uphold the School's commitment to safeguarding and promoting the welfare of children;
- the length of time since the information became publicly available and whether the applicant's circumstances have changed since the information was published;
- whether the information reveals a pattern of concerning behaviour; and
- the relevant circumstances and the explanation(s) offered by the applicant.

For successful candidates, the School will retain information generated through online searches for the duration of the individual's employment and in accordance with its Data Retention Policy.

For unsuccessful candidates, the School retains the information generated from online searches for six months from the date on which they are informed their application was unsuccessful, after which it will be securely destroyed.

5.2 Verification of identity, address, right to work in the UK and qualifications

All applicants who are invited to an Interview will be required to bring with them evidence of their identity, right to work in the UK, address and qualifications. The School asks for this information at interview to ensure that the person attending interview is who they claim to be, that they are permitted to work for the School if appointed and that they hold appropriate qualifications.

Identity and address: all applicants must bring with them to interview, original documents which evidence their identity and address as set out below and in the list of valid identity documents at **Appendix 1** (these requirements comply with DBS identity checking guidelines):

- one document from Group 1*; and
- two further documents from either of Group 1*, Group 2a or Group 2b, one of which must verify the applicant's current address; and

(*applicants must always provide their birth certificate as one form of identity unless there is good reason why this cannot be provided).

Where an applicant claims to have changed their name by deed poll or any other means (e.g. marriage, adoption, statutory declaration) they will be required to provide documentary evidence of the change. They will also be required to provide their birth certificate. The School asks for the date of birth of all applicants in order to verify identity and check for any unexplained discrepancies in the employment and education history. The School does not discriminate on the grounds of age.

Right to work in the UK: all applicants must also bring to interview a valid form of evidence which confirms their right to work in the UK. Valid forms of evidence can be found in the Home Office 'Right to Work Checklist' (Right to work checklist (publishing service.gov.uk)) and in some cases the evidence of your right to work in the UK can also be used as evidence of your identity and address for DBS identity checking purposes.

The School will check evidence of your right to work in the UK in accordance with the Home Office 'Code of Practice on preventing illegal working: Civil penalty scheme for employers: 6 April 2022' (which can be found here: <https://www.gov.uk/government/publications/illegal-working-penalties-codes-of-practice-for-employers>).

Qualifications: all applicants must also bring to interview original documents which evidence any educational and professional qualifications referred to in their application form and/or which the School requests.

Retention of records: the School will retain copies of the documents used to verify candidates' identity, right to work and qualifications in accordance with the School's Data Retention Policy.

5.3 Work History checks and references

A full check of completed application forms, and CVs if provided, is undertaken to verify previous employment history and to check for incomplete history (i.e. gaps in employment). References will be taken up on shortlisted applicants prior to interview where possible.

Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.

All offers of employment will be subject to the receipt of a minimum of two references, which are deemed satisfactory by the School. One of which must be from the applicant's current or most recent employer. If the current/most recent employment does/did not involve work with children, then the second reference should be from the employer with whom the applicant most recently worked with children. References from employers should be from a senior person with appropriate authority, not just a colleague or ex-colleague. Neither referee should be a relative or someone known to the applicant solely as a friend.

In compliance with regulatory requirements for Safer Recruitment, we reserve the right to contact any previous employers, but if they have not been named as referees by the applicant, we will not do so without advising the applicant first.

All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children. All referees will be sent a copy of the job description and/or person specification for the role which the applicant has applied for. If the referee is a current or previous employer, they will also be asked to confirm the following:

- the applicant's dates of employment, salary, job title/duties, reason for leaving, performance, sickness* and disciplinary record;
- whether the applicant has ever been the subject of disciplinary procedures involving issues related to the safety and welfare of children (including any in which the disciplinary sanction has expired), except where the issues were deemed to have resulted from allegations which were found to be unsubstantiated, unfounded, false or malicious;
- whether any allegations or concerns have been raised about the applicant that relate to the safety and welfare of children or young people or behaviour towards children or young people, except where the allegation or concerns were found to be unsubstantiated, unfounded, false or malicious;
- whether the applicant could be considered to be involved in 'extremism' (see the definition of 'extremism' at section 8 below).

(*questions about health or sickness records will only be included in reference requests sent out after the offer of employment has been made.

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials.

The School will compare all references with any information given on the application form. Any discrepancies or inconsistencies in the information will be taken up with the applicant before any appointment is confirmed.

If it has not been possible to obtain prior to interview it will be reviewed upon receipt. Any discrepancies identified between the reference and the application form and/or the interview assessment form will be considered by the School. The applicant may be asked to provide further information or clarification before an appointment can be confirmed.

If factual references are received i.e. those which contain limited information such as job title and dates of employment, this will not necessarily disadvantage an applicant although additional references may be sought before an appointment can be confirmed.

The School will verify information given with the person who provided the reference and, at its discretion, may make telephone contact with referees to verify the details of the written reference provided.

The School treats all references given or received as confidential which means that third parties, including the applicant, would not usually be provided with a copy.

All references from a school must be countersigned by the Head of that school where the Head is not the referee.

All internal candidates who apply for a new role at the School will have their application assessed in accordance with this procedure. References may be taken up on internal candidates as part of the application process and can be provided by colleagues as the School will be the most recent employer and will previously have taken up references from past employers.

5.4 Criminal records check

Prior to 29 May 2013 an enhanced disclosure contained details of all convictions on record (including those which are defined as 'spent' under the Rehabilitation of Offenders Act 1974) together with details of any cautions, reprimands or warnings held on the Police National Computer. It could also contain non-conviction information from local police records, which a chief police officer considered relevant to the role applied for at the School.

5.4.1 DBS filtering rules

With effect from 29 May 2013 the DBS commenced the filtering and removal of certain specified information relating to old and minor criminal offences from all criminal records disclosures. The filtering rules developed by the DBS and the Home Office designate certain spent convictions and cautions as 'protected'. 'Protected' convictions and cautions are not included in a DBS certificate and job applicants are not required to disclose them during the recruitment process. It is unlawful for an employer to take into account a conviction or caution that should not have been disclosed. If a protected conviction or caution is inadvertently disclosed to the School during the recruitment process it must be disregarded when making a recruitment decision.

A conviction will always be disclosable if it was imposed for a 'specified offence' committed at any age. A caution issued for a 'specified offence' committed over the age of 18 will always be disclosable. However, a caution issued for a 'specified offence' committed under the age of 18 is never disclosable. 'Specified offences' are usually of a serious violent or sexual nature or are relevant for safeguarding children and vulnerable adults. The list of 'specified offences' can be found at:

<https://www.gov.uk/government/publications/dbs-list-of-offences-that-will-never-be-filtered-from-a-criminal-record-check>

The filtering rules work as follows:

For those aged 18 or over at the time of an offence

A spent criminal conviction for an offence committed in the United Kingdom when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by the job applicant) if:

- (a) eleven years have elapsed since the date of the conviction;
- (b) it did not result in a custodial sentence; and
- (c) it was not imposed for a 'specified offence'.

A spent caution for an offence committed when a person was over the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

- (a) six years have elapsed since the date it was issued; and
- (b) it was not issued for a 'specified offence'.

For those aged under 18 at the time of an offence

A spent conviction for an offence committed when a person was under the age of 18 will not be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant) if:

- (a) five and a half years have elapsed since the date of the conviction;
- (b) it did not result in a custodial sentence; and
- (c) it was not imposed for a 'specified offence'.

A caution issued for an offence committed when a person was under the age of 18 will never be disclosed in a DBS certificate (and does not have to be disclosed by a job applicant).

5.4.2 Regulated activity

The School applies for an enhanced disclosure from the DBS and a check of the Children's Barred List (now known as an Enhanced Check for Regulated Activity) in respect of all positions at the School which amount to 'regulated activity' as defined in the Safeguarding Vulnerable Groups Act 2006 (as amended). The purpose of carrying out an Enhanced Check for Regulated Activity is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and to obtain other relevant suitability information. Any position undertaken at, or on behalf of the School will amount to 'regulated activity' if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30 day period; and
- provides the opportunity for contact with children.

Roles which are carried out on an unpaid / voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

It is for the School to decide whether a role amounts to 'regulated activity' taking into account all the relevant circumstances. However, nearly all posts at the School amount to regulated activity. Limited exceptions could include an administrative post undertaken on a temporary basis in the School office outside of term time or voluntary posts which are supervised.

5.4.3 The DBS disclosure certificate

The DBS issues the DBS disclosure certificate to the subject of the check only, rather than to the School. It is a condition of employment with the School that the **original** disclosure certificate is provided to the School as soon as possible following receipt by the applicant. Original certificates should not be sent by post. A convenient time and date for bringing the certificate into the School should be arranged. Applicants who are unable to attend at the School to provide the certificate are required to send in a certified copy by post or email as soon as possible following receipt. Where a certified copy is sent, the original disclosure certificate must still be provided on the first working day.

Employment will remain conditional upon the original certificate being provided and it being considered satisfactory by the School.

The School expects supply/temporary worker agencies/company contractors that are used by the School, to register with the DBS on their own account and to follow their policy or their own comparable policy. Confirmation of a satisfactory enhanced DBS check (and a copy of the DBS certificate where information is disclosed), in addition to other recruitment checks, on workers supplied by agencies/company contractors will be required before the School will commission services from any such organisation.

We make every subject of a DBS Disclosure aware of the existence of the DBS Code of Practice and the DBS Privacy Policy for applicants and direct applicants where to find copies.

Those staff who may work seasonally or who are likely to have a gap in service of three months or more are required to register with the DBS Update Service. This negates the requirement for a new DBS application at the beginning of every employment period.

The School may request a DBS check of visiting speakers prior to them visiting the School if, following relevant information searches, they deem it appropriate. Please refer to the School's Visiting Speaker Policy for further information.

5.4.4 Starting work pending receipt of a DBS disclosure

If there is a delay in receiving a DBS disclosure the Head has discretion to allow an individual to begin work pending receipt of the disclosure certificate. This will only be allowed if all other checks, including a clear check of the Children's Barred List (where the position amounts to regulated activity), have been completed and once appropriate supervision has been put in place.

5.4.5 Applicants with periods of overseas residence

DBS checks will still be requested for applicants with recent periods of overseas residence and those with little or no previous UK residence. The School will take into account the 'DBS unusual addresses guide' in such circumstances.

For applicants who are living overseas, or who have lived overseas previously, obtaining a DBS certificate may be insufficient to establish their suitability to work at the School. In such cases the applicant will be required to provide additional information about their suitability from the country (or countries) in which they have lived. The School's policy is to request such information from each overseas country in which the applicant has lived for a period of three months or more in the previous five years.

When requesting such information the School has regard to relevant government guidance and will therefore always require the applicant to apply for a formal check from the country in question i.e. a criminal records check (or equivalent) or a certificate of good conduct.

The School recognises that formal checks are not available from some countries, that they can be significantly delayed or that a response may not be provided. In such circumstances the School will seek to obtain further information from the country in question, such as a reference from any employment undertaken in that country.

In addition, where an applicant for a teaching position has worked as a teacher outside of the UK, the School will ask the applicant to obtain from the professional regulating authority of the teaching profession in each country in which they have worked as a teacher, evidence which confirms that they have not imposed any sanctions or restrictions on the applicant and that they are not aware of any reason why the applicant may be unsuitable to work as a teacher. The School will also ask shortlisted applicants (and their referees) to disclose whether they have ever been referred to, or are the subject of a sanction issued by, the regulator of the teaching profession in the countries in which they have carried out teaching work.

Sanctions and restrictions issued by the regulating authority of another country will not prevent a person from working as a teacher at the School. However, the School will take all relevant information into account in determining whether an applicant is suitable to work at the School.

The School may allow an applicant to commence work pending receipt of a formal check from a particular country if it has received a reference and/or letter of professional standing from that country and considers the applicant suitable to start work. Decisions on suitability will be based on all of the information that has been obtained during the recruitment process. Unless expressly waived by the School, continued employment will remain conditional upon the School being provided with the outcome of the formal check and it being considered satisfactory.

If no information is available from a particular country the School may allow an applicant to commence work if they are considered suitable based on all of the information that has been obtained during the recruitment process. The School will take proportionate risk-based decisions on a person's suitability in these circumstances. If the formal check is delayed and the School is not satisfied about the applicant's suitability in the absence of that information, the applicant's proposed start date may be delayed until the formal check is received.

5.5 Prohibition from teaching check

The School is required to check whether staff who carry out 'teaching work' are prohibited from doing so. The School uses the Teaching Regulation Agency Teacher Services system to check whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the Teaching Regulation Agency.

In addition, the School asks all shortlisted applicants to declare whether they have ever been referred to, or are the subject of a sanction, restriction or prohibition issued by the teaching Regulation Agency or other equivalent body in the UK.

Where an applicant is not currently prohibited from teaching but has been the subject of a referral to, or hearing before, the Teaching Regulation Agency (or other equivalent body) whether or not that resulted in the imposition of a sanction, or where a sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

The School applies the definition of 'teaching work' set out in the Teachers' Disciplinary (England) Regulations 2012 which states that the following activities amount to 'teaching work':

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

The above activities do not amount to 'teaching work' if they are supervised by a qualified teacher or other person nominated by the Head. If in any doubt or if the applicant has taught previously, or may teach in future, the check will be undertaken, including for sports coaches.

5.6 Prohibition from management (S.128) check

The School is required to check whether any applicant for a management position is subject to a direction under section 128 of the Education and Skills Act 2008 which prohibits, disqualifies or restricts them from being involved in the management of an independent school (a section 128 direction).

The School will carry out checks for section 128 directions when appointing applicants into management positions from both outside the School and by internal promotion. This check applies to appointments to the following positions made on or after 12 August 2015:

- Head
- teaching posts on the senior leadership team
- teaching posts which carry a departmental head role; and
- support staff posts on the senior leadership team.

The School will assess on a case-by-case basis whether the check should be carried out when appointments are made to teaching and support staff roles which carry additional responsibilities.

All individuals who are appointed to the governing body will be subject to a section 128 direction check.

The relevant information is contained in the enhanced DBS disclosure certificate (which the School obtains for all posts at the School that amount to regulated activity). It can also be obtained through the Teaching Regulation Agency Teacher Services system. The School will use either, or both, methods to obtain this information.

In addition, the School asks all shortlisted applicants to declare whether they have ever been the subject of a referral to the Department for Education or are subject to a section 128 direction or any other sanction which prohibits, disqualifies or restricts them from being involved in the management of an independent school.

Where an applicant is not currently prohibited from management but has been the subject of a referral to, or hearing before, the Department for Education or other appropriate body whether, or not, that resulted in the imposition of a section 128 direction or other sanction, or where a section 128 direction or other sanction has lapsed or been lifted, the School will consider whether the facts of the case render the applicant unsuitable to work at the School.

5.7 Disqualification from acting as a charity trustee or senior manager

5.7.1 Background

Under the Charities Act 2011 it is a criminal offence for a person to act as a trustee or senior manager of a charity when disqualified from doing so. The Charities Act 2011 sets out the grounds on which a person can be disqualified from acting as a trustee or senior manager. These include various spent and unspent criminal offences and other sanctions.

5.7.2 Who is covered

A person is considered to be a charity trustee if they are one of the people who have general control and management of the administration of the charity. In an independent school the trustees will typically be the Governors of the school. Senior managers include those employees who report directly to the charity trustees or have responsibility for the overall management and control of the charity's finances. At the School the disqualification rules will be applicable to all Governors, the Head, Bursar and potentially other senior staff to report directly to the Governors.

There is no single list or register that covers all of the disqualification criteria and the School therefore adopts a pragmatic approach to checking whether a person is disqualified. This is achieved by the use of a self-declaration form and checking of the relevant publicly accessible registers.

5.7.3 Self-declaration

All those who are covered by the disqualification rules are required to complete a self-declaration form to confirm whether, to the best of their knowledge, they are subject to any of the disqualification criteria.

A failure to disclose relevant information, or the provision of false information, which subsequently comes to the School's attention may result in the termination of an appointment as a governor or senior manager or the withdrawal of an offer of employment and may also amount to a criminal offence.

All those who are required to complete a self-declaration form are also under an ongoing duty to inform the School if there is a change in their circumstances that results or may result in them becoming disqualified from acting as a governor or senior manager.

5.7.4 Checks by the School

To ensure that it has accurate and up to date information the School will also check the following registers in respect of each governor and senior manager who is already in post or is appointed in future:

- the Bankruptcy and Insolvency Register;
- the register of disqualified directors maintained by Companies House; and
- the register of persons who have been removed as a charity trustee.

5.7.5 Waiver

A person who discloses that one or more of the disqualification criteria is applicable to them may apply to the Charity Commission for a waiver of the disqualification.

The School may at its absolute discretion withdraw an offer of employment for a senior manager or cease or terminate an appointment to the governing body if a waiver application becomes necessary or is rejected by the Charity Commission. The School is under no obligation to await the outcome of a Charity Commission waiver application before taking such action.

5.8 Medical Fitness

The School is legally required to verify the mental and physical fitness of anyone to be appointed to a post at the School **after** an offer of employment has been made but **before** the appointment is confirmed.

It is the School's practice that all applicants to whom an offer is made must complete a Health Questionnaire. Information from a completed questionnaire would be reviewed against the job description for the particular role, together with any details of any other physical or mental requirements of the role i.e. proposed timetable, extra-curricular activities, technical aspects of the role, layout of the School etc. If there is any doubt about

an applicant's fitness to fulfil the role the applicant will be referred for a consultation with the School's Occupational Health Consultant, and the School will consider reasonable adjustments in consultation with the applicant. The School may also seek further medical advice from a specialist or request that the applicant undertake a full medical assessment.

The School is aware of its duties under the equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, obtaining medical evidence, considering reasonable adjustments and suitable alternative employment.

6. Contractors and Agency Staff

The School must complete the same checks for contractors (and their employees) undertaking regulated activity at the School as it does for its own employees. The School requires written confirmation from the contractor that it has completed these checks on all of those individuals whom it intends will work at the School before an such individual can commence work for/at the School.

Agencies who supply staff to the School must also complete the pre- employment checks which the staff would otherwise complete for its staff. Again, the School requires confirmation that these checks have been completed before an individual can commence work for and/or at the School.

The School will independently verify the identity of individuals supplied by contractors or an agency in accordance with section 5.2 above and requires the provision of the DBS disclosure certificate before those individuals can commence work for/at the School.

7. Volunteers

The School will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with pupils at or on behalf of the School (the definition of regulated activity set out in section 5.4.2 above will be applied to all volunteers).

The School will request an enhanced DBS disclosure without Children's Barred List information on all volunteers who do not undertake regulated activity. This is likely to be because their volunteering duties are subject to regular, day to day supervision by a fully checked member of staff or by a volunteer who the School has deemed appropriate to supervise and ensure the safety of those pupils in their care.

Under no circumstances will the School permit an unchecked volunteer to have unsupervised contact with pupils.

It is the School's policy that a new DBS certificate is required for volunteers who will engage in regulated activity but who have not been involved in any activities with the School for three consecutive months or more. These volunteers who are likely to be involved in

activities with the School on a regular basis may be required to sign up to the DBS update service as this permits the School to obtain up to date criminal records information without delay prior to each new activity in which a volunteer participates.

In addition, the School will seek to obtain such further suitability information about a volunteer as it considers appropriate in the circumstances. This may include (but is not limited to the following):

- formal or informal information provided by staff, parents and other volunteers,
- character references from the volunteer's place of work or any other relevant source; and
- an informal safer recruitment interview.

8. Visiting Speakers and the Prevent Duty

The Prevent Duty Guidance requires the School to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by pupils, are suitable and appropriately supervised.

The School is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity at the School or perform any other regular duties for or on behalf of the School.

All visiting speakers will be subject to the School's usual visitors and security protocols. This will include signing in and out at Reception, the wearing of a visitors' badge at all times and being escorted by a fully vetted member of staff between appointments.

The School will also obtain such formal or informal background information about a visiting speaker as is reasonable in the circumstances to decide whether to invite and / or permit a speaker to attend the School. In doing so the School will always have regard to the visitors and security protocols, the Prevent Duty Guidance and the definition of "extremism" set out in KCSIE which states:

'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces"

In fulfilling its Prevent Duty obligations the School does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, gender reassignment, disability or age.

9. Policy on recruitment of ex-offenders

9.1 Background

The School will not unfairly discriminate against any applicant for employment on the basis of conviction or other details disclosed. The School makes appointment decisions on the

basis of merit and ability. If an applicant has a criminal record this will not automatically bar them from employment with the School. Each case will be decided on its merits in accordance with the objective assessment criteria set out in section 9.2 below.

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All applicants must therefore declare all previous convictions, including those which would normally be considered "spent" except those received for an offence committed in the UK if it has been filtered in accordance with the DBS filtering rules (see 5.4.1 above).

A failure to disclose a previous conviction (which should be declared) may lead to an application being rejected or, if the failure to disclose is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence.

It is unlawful for the School to employ anyone who is barred from working with children. It is a criminal offence for any person who is barred from working with children to apply for a position at the School. The School will make a report to the police and / or the DBS if:

- it receives an application from a barred person
- it is provided with false information in, or in support of an applicant's application; or
- it has serious concerns about an applicant's suitability to work with children.

9.2 Assessment criteria

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question
- the seriousness of any offence or other matter revealed
- the length of time since the offence or other matter occurred
- whether the applicant has a pattern of offending behaviour or other relevant matters
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters; and
- the circumstances surrounding the offence and the explanation(s) offered by the applicant.

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences:

- murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence; or

- serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving within the last ten years.

9.3 Assessment procedure

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will carry out a risk assessment by reference to the criteria set out above.

If an applicant wishes to dispute any information contained in a disclosure, they can do so by contacting the DBS direct. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the School may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

9.4 Retention and security of disclosure information

The School's policy is to observe the guidance issued or supported by the DBS on the use of disclosure information.

10. Whistleblowing

All staff are expected and encouraged to raise concerns they have, whether related to the safeguarding and welfare of pupils, the conduct of staff or other matters, during the course of employment in accordance with the School's policies (including the Whistleblowing Policy, the Safeguarding Policy and the Staff Code of Conduct). All staff receive training so that they understand the School's expectations. Safeguarding children is at the centre of the School's culture and is accordingly considered formally during staff performance and development reviews and finally when staff leave the School as part of the exit questionnaire/interview process.

11. Referrals to the DBS and Teaching Regulation Agency

This policy is primarily concerned with the promotion and practice of safer recruitment. However, applicants should also be aware that the School has legal responsibilities to fulfil

when employment comes to an end, In particular, the School has a legal duty to make a referral to the DBS where:

- an individual has applied for a position at the School despite being barred from working with children; and/or
- an individual has been removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child.

The DBS will consider whether to impose sanctions on that individual which may restrict or prevent them from working with children in future.

In addition, if a teacher is dismissed because they are found to have committed serious misconduct, or they have breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will make a referral to the Teaching Regulation Agency.

The Teaching Regulation Agency will consider whether to impose a prohibition from teaching order.

12. Queries

If an applicant has any queries on how to apply for a post at the School, they should contact the Head of HR.

Addendum to Safeguarding Policy – Remote Education

Update

Society has now entered the phase of 'learning to live with COVID', however there is the possibility that remote education will still be helpful or indeed necessary.

The protocols developed for the delivery of remote education remain in place.

Pastoral Use of Teams Meetings

Face-to-face meetings are in the main the most effective way of supporting students. On occasion though, it may be appropriate to meet on Teams, particularly if a student is not attending school.

The protocols developed during 2020-21 remain in place and should be followed. One-to-one sessions on Teams must be recorded, with your pastoral supervisor invited to attend. They must also have access to your recordings folder. Staff who are new to the school can seek additional support from a member of the safeguarding team or their line manager if they are unsure of the protocols.

Academic Support using Teams Meetings

Many colleagues and students found the use of Teams for clinic sessions both effective and efficient. Clashes of activities were much easier to resolve. Once again, the protocols developed in 2020-21 should be followed. Sessions must be recorded, and other members of your department must have access to them.

[Online protocols](#) from 2020-21 are kept on the 'K' Drive and should be used in 2025-26 where appropriate.

Support, Information, advice and guidance

Appendix B of KCSIE (2025) has a number of links to resources and sources of support and advice. Below are a few that may be of particular relevance.

YouthTalk is a charity based in St Albans offering support and counselling to young people in the area. It is a free service <http://youthtalk.org.uk/>

Herts Mind Network provide emotional support, advice and information and discuss coping strategies.

<https://www.hertsmindnetwork.org/young-peoples-helpline> .

Helpline number is **01923 256391**. Herts Mind Network also have a Young People's online group for those over 15.

<https://www.hertsmindnetwork.org/young-peoples-online-group>

Kooth is an online counselling service for anyone aged 10-25 in Hertfordshire. You can access a **chat / messenger** service, discussion boards, goal setting tools and a journal and a magazine containing several articles and some specifically about coronavirus and the impact on children and young people. The website is moderated by trained professionals. You need to register but it is anonymous. <https://www.kooth.com/>

Young Minds is the UK's leading charity fighting for children and young people's mental health.

<https://youngminds.org.uk/find-help/looking-after-yourself/coronavirus-and-mental-health/>

[NSPCC – Domestic Abuse](#) is an information website covering all aspects of domestic abuse and it's effects on both adults and children.

[Internet Matters](#) is designed to help parents keep their children safe online.

Websites

Just Talk is a multi-agency campaign, steered by young people and coordinated by the Public Health team at Hertfordshire County Council. The website has collected a number of helpful resources and put them on a dedicated 'looking after your mental health during coronavirus' page. These are added to frequently, so keep checking back. THIS WILL BE THE MAIN WEBSITE FOR LOCAL UPDATES.

<https://www.justtalkherts.org/news/looking-after-your-mental-health-during-coronavirus.aspx>

Health for Kids / Teens cover subjects that promote a healthy body and mind. All of the content has been produced by school nurses, a whole range of other health and wellbeing experts, and most importantly young people.

Ages 11-19 <https://www.healthforteens.co.uk/hertfordshire/>

Online workshops and training

The OLLIE Foundation are also delivering workshops online. You can view the schedule at the top of this page: <https://theolliefoundation.org/training/dates/#hbb> Courses suitable for teenagers are 'Keeping safe and carrying on for Teens' and 'Goalsetting for Teens'.

Herts Mind Network deliver a number of online workshops onlineonlineMore information can be found here <https://www.hertsmindnetwork.org/>