TCES
NATIONAL ONLINE SCHOOL

Safeguarding Children & Adults at Risk Policy and Procedures

Approved by TCES Operational Board on behalf of

Thomas Keaney, CEO and Schools' Proprietor

Date of next formal review, September 2024

This policy applies to the TCES National Online School

Contents

Introduction

This Safeguarding Policy embodies the philosophy and ethos of the TCES National Online School and the principles of Working Together to Safeguarding Children 2018 and the Department for Health and Social Care's Care and Support Statutory Guidance 2014. We also have regard to the primary statutory guidance for the education sector, Keeping Children Safe in Education 2023.

Safeguarding children and vulnerable young adults and promoting their wellbeing must run through the company like the lettering through a stick of rock. It is an attitude of mind, a belief system and a way of thinking that holds the wellbeing of our pupils at the forefront of every action, with their safety and protection at all times of paramount importance. Resolutely keeping in mind, the twin goals of safeguarding and the promotion of wellbeing informs and shapes our ways of working and will often help to resolve the many conflicts and dilemmas that can occur.

Policies and systems such as safer recruitment, behaviour management, child protection and whistleblowing procedures arise out of our belief system and are used to promote and sustain it. They are not an end in themselves but are essential tools and need to be kept 'live' to support the culture and to help maintain a commitment to best practice and legal requirements. They help clarify the actions we must take in some defined circumstances and may be useful reminders in areas where we have become hazy or are uncertain of what is expected of us. Ultimately, it is our belief that a commitment to safeguarding children and vulnerable adults and promoting their wellbeing will work to equal the safety and wellbeing of all staff members and other adults whose aim is to promote good education outcomes and future life experiences for young people.

We hope that all who share our commitment to safeguarding children and vulnerable adults and promoting their wellbeing, will find their own lives enriched by the experience. Your contributions make a significant difference in shaping a safer and brighter future for those who depend on us.

Thomas Keaney
CEO, TCES

Policy Review:
This policy is reviewed annually by the Senior Management Team and is signed off accordingly by the CEO (recorded and indicated as per the back page of this policy – **The TCES Policy Sign off**.)

This Safeguarding Policy is available in hard copy on request and on the National Online School website.

Part One: Safeguarding at TCES

Policy and Legislation

The policy is based on the Department for Education's statutory guidance [Working Together to Safeguarding Children 2018](#) and the Department for Health and Social Care's [Care and Support Statutory Guidance 2014.](#) We also have regard to the primary statutory guidance for the education sector, [Keeping Children Safe in Education 2023](#).

This policy is also based on the following legislation:

- [The Children Act 1989](#) **(**[and 2004 amendment](#)**),** which provides a framework for the care and protection of children
- The [Care Act 2014](#), which provides a framework for the care and protection of adults.
- ['Mandatory Reporting of Female Genital Mutilation - procedural information', Home Office (October 2015)](#)
- [The Rehabilitation of Offenders Act 1974](#)
- [Schedule 4 of the Safeguarding Vulnerable s Act 2006](#)
- [The Prevent duty: Departmental advice for schools and childcare providers', DfE (2015)](#)
- [The Childcare (Disqualification) Regulations 2009 and Childcare Act 2006](#)
- [The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018](#)
- [Guidance for Safer Working Practices for Adults who work with Children and Young People in Education Settings' (February 2022)](#)
- [What to do if you're worried a child is being abused', DfE (March 2015)](#)
- [Information sharing: advice for practitioners providing safeguarding services (July 2018)](#)
- Safeguarding and remote education (2022)
- [The London Child Protection Procedures](#) (as signed up to by [Merton Safeguarding Children Partnership](#) (MSCP)).
- [London Multi-Agency Adult Safeguarding Policy and Procedures](#) (as signed up to by [Merton Safeguarding Adults Board](#))

Definitions

Children includes everyone under the age of 18.

Adults includes everyone aged 18 and over.

Safeguarding children means:

- protecting children from maltreatment
- preventing 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.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Safeguarding adults means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult's wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear, or unrealistic about their personal circumstances.

Abuse is a form of maltreatment of a child or adult. Somebody may abuse or neglect an adult or child by inflicting harm, or by failing to act to prevent harm. Adults and children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults, or another child or children.

Neglect is a form of abuse and is the persistent failure to meet a child or adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of material substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child or adult from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers) or Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child or adult's basic emotional needs.

There are several associated categories of abuse/neglect commonly associated with safeguarding both children and adults. These include:

Self-neglect covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Physical Abuse – includes hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.

Sexual Abuse – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Domestic Abuse - any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to; psychological, sexual, financial or emotional.

Modern Slavery encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce deceive and force individuals into a life of abuse, servitude, and inhumane treatment.

Capacity refers to the ability to make a decision at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity under the Mental Capacity Act 2005.

Organisational Abuse includes neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill- treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes, and practices within an organisation.

Discrimination is abuse, which centres on a difference or perceived difference particularly with respect to race, gender, or disability or any of the protected characteristics of the Equality Act.

Financial or Material Abuse includes theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Emotional or Psychological Abuse includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Cyber Bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating, or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

Forced Marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

Mate Crime as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an

illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been several Safeguarding Adult Reviews relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Radicalisation The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media.

Adults at Risk were formerly referred to as 'vulnerable adults' in previous legislation, a term which was felt to be both stigmatising and unhelpful in practice. We therefore use this term throughout this policy.

Policy Outline

It is the policy of the National Online School to create and maintain a culture of vigilance in safeguarding students and an active commitment to the promotion of their general wellbeing. This is promoted through the maintenance of robust and rigorous recruitment and working practices, education and learning modules, child protection systems and multi-agency working.

It is therefore the responsibility of all staff to play an active role in safeguarding students and promoting their wellbeing and to promote the same in others. All staff must actively work to ensure students are protected from possible harm. They must provide a caring, positive, safe, and stimulating online environment that helps to promote student's social, physical, emotional, and moral development as an integral part of their educational progress.

The aims of this safeguarding policy are:

- To support students' development in ways that will foster security, confidence, and independence.
- To raise staff awareness of all their own personal and professional responsibilities in safeguarding students and in identifying and reporting possible cases of abuse.
- To contribute to a systematic means of monitoring students known or thought to be at risk of harm and to develop and implement a structured procedure which will be followed in all cases of suspected abuse.
- To promote good levels of communication between all members of staff.
- To develop and promote effective working relationships with others, especially parents/carers, Local Authorities, the Police, Children's Social Services, and other partnership agencies.
- To ensure that all adults who have access to our students have been checked as to their suitability and to maintain effective supervision where it is required.
- To uphold the ethos of safeguarding our students, promoting their wellbeing and to work within the framework of the overall company policy.

Procedures

Our procedures for safeguarding children are in line with current statutory guidance, The London Child Protection Procedures and Merton Safeguarding Children Partnership local safeguarding arrangements.

Our procedures for safeguarding adults are in line with the current statutory guidance, the [London Multi-Agency Adult Safeguarding Policy and Procedures](#) and Merton Safeguarding Adults Board local safeguarding arrangements

We will ensure that:

- We have a designated safeguarding lead (DSLs) and a deputy (where required) available to staff, students and external agencies who undertake regular safeguarding training; this training takes place more regularly than the recommended two years.
- All staff including DSL's will be updated annually on any additional guidance issued on safeguarding to provide them with relevant skills and knowledge to safeguard students effectively.
- All members of staff will be appropriately briefed, trained, and supported in implementing this safeguarding policy as well as the requirements of our statutory guidance and local safeguarding procedures.
- All members of staff are supported to develop their understanding of the signs and indicators of abuse.
- All members of staff know how to respond to a student who discloses abuse.
- All parents/carers, students and members of staff are given information, guidance, and support regarding safe online conduct. This includes knowing how to report online content or activity that is inappropriate, abusive, or offensive, to the DSL.
- All parents/carers are made aware of the responsibilities of staff members with regard to our safeguarding procedures.
- Our procedures will be regularly reviewed and updated.
- All staff are fully vetted according to our safer recruitment procedures before commencing work with students.
- All new members of staff will be given a copy of this Safeguarding policy and procedures as part of their induction. They will all be required to read and sign to confirm they understand these documents and their responsibilities contained therein.

Supporting our Students

- We recognise that a student who is abused or witnesses' violence may find it difficult to develop and maintain a sense of self-worth.
- We recognise that a student in these circumstances may feel helpless and humiliated and may feel self-blame.
- We accept that research shows that the behaviour of a student in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- We will support all our students by:
    - Promoting a caring, safe and positive online environment.
    - Liaising and working together with all other support services and those agencies involved in the safeguarding of that student.
    - Notifying Children's Social Care / Adults Social Care as soon as there is a significant safeguarding concern.
    - Providing continuing support to a student about whom there have been concerns where relevant.

Supporting Staff

- The National Online School recognise that staff who become involved with a student who has suffered harm, or appears likely to suffer harm, may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their concerns with the DSL and to seek further support where needed, in consultation with the People Team (HR).
- We offer an Employee Assistance Programme that all staff can access, which offers free, confidential advice and assistance including counseling.

Prevention of harm

We recognise that we can play a significant part in the prevention of harm to our students by providing them with good lines of communication with trusted adults and an ethos of safeguarding, protection, and e-safety. We will therefore:

- Establish and maintain an ethos where students feel secure and are encouraged to talk and are always listened to.
- Ensure that all students know there are adults whom they can contact if they are worried or in difficulty.
- Include curriculum opportunities which equip students with the skills they need to stay safe from harm (including online dangers) and to know to whom they should turn for help should they feel at risk/threatened or under unwelcome pressure.
- Ensure that cybersecurity measures and implemented and maintained across online learning platforms and company devices, to safeguard students and staff members.

Confidentiality

- The National Online School recognises that all safeguarding matters are confidential.
- The DSL or their deputy will only disclose information about a student to other members of staff on a 'need to know' basis.
- We have a professional responsibility to share information with other agencies in order to safeguard students.
- We cannot and must not promise to keep secrets.
- We will always share information within the parameters of governmental guidance: *Information sharing: advice for practitioners providing safeguarding services* (July 2018)

Filtering and monitoring

- Our policy on filtering and monitoring is set out in TCES Filtering and Monitoring policy. It acknowledges our responsibility to to ensure all staff are trained and updated on the filtering and monitoring requirements and protect children from harmful and inappropriate online content by doing all that we reasonably can to limit children's exposure to risks from the school's IT system. This is achieved through implementation of filtering and monitoring systems that block harmful and inappropriate content without unreasonably impacting teaching and learning; and monitor internet activity with safeguarding concerns addressed through the necessary channels outlined within this policy. The effectiveness of TCES filtering and monitoring systems is reviewed regularly.

Roles and Responsibilities

At the TCES National Online School, we are committed to safeguarding our students and we expect everyone who works within our service to share this commitment. All staff take welfare concerns seriously and encourage students to talk to us about anything that worries them.

All staff are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. Where staff have a mental health concern about a student, they should raise the issue by informing the designated safeguarding lead or a deputy in the usual way.

Staff recognise that when a student has a social worker, it is an indicator that the student may be more at risk than most students. For example, this may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health. We take these needs into account when making plans to support students who have a social worker.

We will always act in the best interest of our students.

TCES Head of Safeguarding will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our website and has been written in line with Local Authority guidance and the requirements of Merton Safeguarding Children Partnership and Merton Safeguarding Adults Board policies and procedures.
- The National Online School contributes to inter-agency working in line with Working Together to Safeguard Children 2018 and Care and Support Statutory Guidance 2014
- A senior member of staff from the National Online School is designated to take the lead responsibility for safeguarding and child/adult protection.
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate safeguarding training that is updated annually.
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance.
- Safer recruitment practices are followed in line with the requirements of the London Child Protection Procedures.
- They remedy, without delay, any weakness with regards to our safeguarding arrangements that are brought to their attention.

At each termly meeting the Head of Safeguarding will receive a safeguarding report that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the National Online School. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual students.

Our Head of National Online School will ensure that*:*

- The policies and procedures adopted by the TCES Head of Safeguarding are fully implemented and followed by all staff.

- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead (and any deputies) to carry out their roles effectively, including the assessment of students and attendance of strategy discussions and other necessary meetings, e.g., child protection conferences / core group meetings (where applicable) / child in need meetings.
- All staff feel able to raise concerns about poor or unsafe practice with regards to students, and such concerns are addressed sensitively and effectively in a timely manner in accordance with our Whistleblowing Policy.
- All students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Relevant staff have completed Safer Recruitment training.
- The procedure for managing allegations against staff is known by staff.
- They operate the procedure for managing allegations effectively and refer relevant concerns to the Local Authority Designated Officer (LADO).
- There is the provision of a "an orderly, warm, supportive and above all safe environment" for students to engage constructively with the online learning process.
- Parents/carers are aware that the full safeguarding policy and associated policies are available on request. The safeguarding policy is available on our website.
- They can act as deputy Designated Safeguarding Lead (where required) in relation to safeguarding matters and ensure that appropriate action is taken on concerns or allegations of abuse or suspicion of harm, including the support needed for both students and staff.
- They oversee the encouragement and support of students in contributing to the development of good safeguarding structures, including diversity and equal opportunities, behaviour policy and behaviour management procedures, anti-bullying and diversity and equal opportunities policies and feedback and complaints mechanisms.
- They oversee the development of whole group processes such as school councils to promote coproduction in addressing group issues and contribution to school planning and development.
- They develop and maintain of good liaison, home/school contact and support for inter-agency working.
- They ensure that high professional standards are maintained in all essential and required record keeping, reporting and information sharing.
- They provide termly reports to the Head of Safeguarding and Proprietor (where requested) that cover information on the following: whole service/project matters, staff training and development (CPD), curriculum matters, child/adult protection issues and all other issues or developments in relation to all aspects of safeguarding and wellbeing.
- They liaise with the Head of Safeguarding and Proprietor (where requested) regarding the annual review of all policies and procedures relating to National Online School provision and the information to be given to the Local Authority/MASH on how the company's safeguarding duties have been fulfilled.
- Pupils are taught about safeguarding, including online, through various teaching and learning opportunities, including PSHE, as part of providing a broad and balanced curriculum.
- Pupils are taught to recognise when they are at risk and how to get help when they need it.

The Designated Safeguarding Lead (DSL):

The DSL is a senior member of staff, from the leadership team who takes lead responsibility for safeguarding and child/adult protection within the National Online School. The DSL will carry out their role in accordance with the responsibilities outlined in Working Together to Safeguard Children 2018 and the Care and Support Statutory Guidance 2014

National Online School Designated Safeguarding Lead
Kirsten Roy
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National Online School Deputy Designated Safeguarding Lead
Matthew Cooley
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The DSL will provide advice and support to other staff on student welfare and child/adult protection matters. Any concern for a student's safety or welfare will be recorded in writing and given to the DSL. The DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns via telephone and any other relevant media.

The DSL will be aware of students who have a social worker and help promote educational outcomes by sharing information about the welfare and any safeguarding issues with relevant teachers and the National Online School leadership staff where appropriate.

The DSL will represent the National Online School at any statutory safeguarding meetings where required to do so. Through appropriate training, knowledge and experience, our DSL will liaise with Children's or Adult's Services and other agencies where necessary and make referrals of suspected abuse to the relevant Local Authority, take part in strategy meetings/discussions and other interagency meetings, and contribute to the assessment of students.

The DSL will maintain written records and safeguarding files ensuring that they are kept confidential and stored securely.

The DSL is responsible for ensuring that all staff members (including volunteers) are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers, and regular visitors have received appropriate safeguarding and child/adult protection information during induction and that appropriate training needs are identified.

The DSL will also be the lead for 'Early Help' support (where applicable).

Administration and Policy - the CEO will ensure that:

- the National Online School's policies prioritise the safeguarding of students, promote their wellbeing and involve students and others in their development
- staff files are kept at Central Services in accordance with the recruitment, vetting and HR/Employment policies and a single central record (SCR) is kept of all staff appointments, including agency supply workers, that provides secure evidence of Safer Recruitment processes being in place. This includes checking identity, qualifications and criminal records, eligibility to work with children and young people and eligibility to work in the UK and references (two references, one from the last employer). Prohibition from teaching checks (where applicable), overseas checks for those staff who have worked outside the UK and EEC and a check for medical fitness and staff member's employment history has been verified (full CV with tight chronology)
- any gaps are investigated during the interview process and responses kept on file; this record to be held available for inspection or audit
- clear policies are in place and are consistently adhered to regarding internet and ICT use (including copyright laws), the use of photographs of students, one to one online working
- contact details of parents/carers are kept up to date and protocols established for when contact must be made or is recommended as good practice

- clear information is given to students and parents/carers on the education provision, including timetabling, procedures, contact details, requirements for information sharing, complaints, and feedback mechanisms and TCES National Online School's expectations of students and parents/carers and what they may expect in return
- students have clear access to and understand their right to use a formal complaint system and to be supported in making any complaint
- parents/carers are given copies of the complaints letter and understand their rights and the student's right to use a formal complaint system and to be supported in making any complaint.
- there is a clear policy on curriculum planning and curriculum development that promotes good learning skills and all-round development
- the service is monitored to ensure that no students is discriminated against due to age, gender, race, culture, religion, language, disability or sexual orientation
- there are clear procedures for unauthorised absence, or where a child goes missing from education
- written parental consent is obtained where required
- written records are kept of any injury or illness that occurs during online learning sessions, with details of any treatment given
- accurate, detailed records are maintained of all 'critical incidents', including actions taken, and copied on the same working day to Central Services; any follow-up action or consequences must be similarly recorded and copied to Central Services.
- all staff members have an up-to-date copy of the staff handbook that sets out clearly the expectations the company has of them in regard to safeguarding students and promoting their welfare, as well as other matters relating to their TCES employment.

Staff Responsibilities (as supported by the Head of National Online School and DSL where relevant)

- all staff members must be familiar with the company's policies and procedures and are fully committed to the principles and good practice guidelines, as defined in the safeguarding policy objectives
- all staff members understand the importance of online safety, fully comply with all cyber security measures, and have access to timely information technology support
- there is a firm commitment within the National Online School to promote equalities issues and to ensure that no student is discriminated against due to age, gender, race, culture, religion, language, disability or sexual orientation
- there is a programme of Continuous Professional Development (CPD) in place for all staff to include the formal processes of safeguarding and child/adult protection training and professional supervision and appraisal
- safeguarding and child/adult protection responsibilities are clear to all staff members within the National Online School, and they know whom to go to with any concerns, including any issues around colleagues' behaviour or practice
- all staff are made aware that inappropriate behaviour towards students is unacceptable. This includes but is not limited to:
- any form of sexual conduct, including sexually suggestive comments
- engaging in sexually provocative games
- lending or borrowing of money or property
- giving or receiving gifts
- exclusive or secretive relationships
- giving of home /personal mobile numbers or home address details to students.
- 'Friending' or 'following' a child on any form of social media or gaming platform

For more details, refer to the TCES staff code of conduct and guidance for safer working practice.

- it is an offence for a person over 18 (e.g., teacher/TA) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of the child, even if the relationship is consensual and even if they do not work directly with them *[Sexual Offences Act 2003]*
- If they are found to have acted inappropriately towards a child, they may be referred to the Designated Officer for the Local Authority (LADO) and DBS for consideration of barring
- there is a commitment to support the needs of 'looked after' children in attending care reviews and case conferences where requested. These needs are usually met by the Designated Teacher for Looked After Children by the school where the child is on-roll but may require support from the HLS DSL
- there is an understanding and commitment to good multi-agency working and information sharing, including the need for open debate and challenge
- staff understand and are committed to the company model of behaviour management and receive training in ways of managing difficult behaviour
- staff have a clear understanding of what constitutes safe practice and feel supported both in raising concerns about poor or unsafe practice and in having their own practice challenged by others
- concerns about poor or unsafe practice are addressed sensitively and effectively in a timely manner and in accordance with the company's whistleblowing policy and commitment to openness of practice
- staff are prepared in advance for students to bring up personal problems within the virtual classroom or at home. Issues such as domestic violence and abuse can be difficult to broach directly, however discussions about personal safety and keeping safe can reinforce the message that any kind of violence is unacceptable. Raising these issues may lead students to bring up problems and concerns of their own. This is an opportunity to acknowledge that it is okay for young people to talk about their own problems and to signpost sources of help
- staff are trained to recognise and understand the boundaries and limitations of confidentiality in the context of their own safety and of child/adult protection
- staff are supported effectively and protected from danger and/or the risk of violence.

NOTE: for more detailed information in any of the above areas, please refer to the list of associated policies

The People Team (HR) department is responsible for:

- Ensuring that all agency workers have had all appropriate checks carried out on them by their agency prior to commencing work with the National Online School and that written confirmation of these checks have been received by the People Team from the agency prior to arriving at the National Online School.
- Ensuring that the National Online School has confirmed the identity of the agency worker upon arrival at the National Online School by viewing and keeping on file original photographic ID such as a passport
- That all permanent employees have had all appropriate pre-employment checks carried out prior to commencing work for the Service. These include but are not limited to:
- A minimum of two satisfactory written references
- A satisfactory DBS check and a check of the DBS Barred Children List
- If appropriate, Police checks from any country where a candidate has lived overseas

- Qualifications, specifically those relating to Qualified Teachers
- Identity checks – proof of Identity, proof of Date of Birth, Proof of current address, proof of eligibility to work in the UK.

Meeting the TCES Safeguarding Objectives

Meeting the TCES safeguarding objectives requires personal commitment and the support of systems designed to:
- prevent unsuitable people from working with our students.
- promote safe working practice and challenge poor or unsafe practice.
- identify instances where there are grounds for concern about a student's welfare and initiate or take appropriate action to keep them safe.
- create a culture of openness, tolerance, and respect for self and others.
- promote personal growth and active learning, with staff and student ownership of the process, through their direct involvement in and contribution to curriculum matters and the National Online School's development, including related policies and procedures.
- contribute to safe and effective partnership working between all those involved with providing services for children and young adults.

Students within the National Online School are actively encouraged and helped to understand what acceptable behaviour is, to show mutual respect for self and others, learn how to stay safe from harm (including online dangers) and to speak out if they have any worries or concerns. They are also given encouragement and reassurance that any concerns they have will be listened to and taken seriously.

Creating a safe and enabling environment requires openness of practice, a culture of vigilance and a clear focus on the culture and shared responsibility and commitment to wellbeing by the following:

- Safe working practice and recruitment, vetting and Baring Service Checks, and employment procedures.
- Health and Safety, Risk Assessment and Risk Management.
- Behaviour policy and Guidelines to Managing Challenging Behaviour.
- Anti-bullying and Diversity and Equal Opportunities policies and ethos.
- Child Welfare/Child Protection Policies and Procedures.
- Philosophy and ethos.
- Behaviour Policy/Code of conduct/education and behaviour contracts.
- Whistleblowing, Equal Opportunities, Anti-bullying and Diversity and Equal Opportunities policies and ethos.
- Feedback mechanisms and Complaints Procedure.
- Curriculum planning and curriculum development.
- Commitment to the principles of the 'Every Child Matters' agenda.
- Taking all reasonable measures to ensure that risks of harm to student's welfare are minimized and;
- Taking all appropriate actions to address concerns about the welfare of a child, children, or adult working to agreed local policies and procedures in full partnership with other local agencies.

Standards

The National Online School recognises the unique status of our students and seeks to ensure that they are treated respectfully as individuals. Relationships between staff also need to be based on

mutual respect and dignity, with a focus on active support, openness of practice, good teamwork, the sharing of practical skills and knowledge and good role-modelling for children and each other:

- It is important that we maintain vigilance in safeguarding and e-safety and a focus on the strategies and good practice requirements for ensuring the promotion of their wellbeing.
- We need to ensure that all our recruitment, management and working practices are in line with safeguarding principles and good practice, that all staff are familiar with the policies and procedures and that they receive the necessary guidance, supervision, and training to enable them to contribute creatively and effectively to the provision of a safe and enabling, high quality education experience for every child.
- We need to develop those aspects of the curriculum that support healthy growth and social and emotional development as well as educational skills and that encourage children to 'speak out' if they have issues that are troubling them.
- We need also to ensure that we react promptly, fairly, and effectively in any instance of concern regarding safeguarding or child/adult protection, recognising that staff and students alike may find the process anxiety-provoking or threatening and are likely to need support.
- Clear information must also be given to children, parents/carers and partner organisations on our complaint's procedures and our child protection, publication scheme and information sharing responsibilities and obligations.

There are designated staff with specific responsibility for child protection. Nevertheless, everyone working within the National Online School is expected to fulfil the wider requirements for safeguarding children and promoting their welfare. All members of staff must accept that in all instances the welfare of the child is paramount.

Areas of Safeguarding Focus / Safeguarding Themes

Abusive Images & Information Communication Technology (ICT)

The internet has become a significant means of distributing abusive images of children and as technology develops, the internet and its range of content services can be accessed through various devices; There is a growing concern that children may be abused through:
- Taking, downloading and/or distribution of images of abuse of child/ren.
- Allowing /encouraging a child to have exposure to inappropriate material via ICT e.g., adult pornography and/or extreme forms of obscene material.
- Children engaging in cyber bullying and use of mobile camera phones to capture violent assaults of other children/young people for circulation.
- Images of abuse of children may be found in the possession of those who use them for personal use or distributed to children as part of the grooming process.
- Internet chat rooms, discussion forums and bulletin boards are used as a means of contacting children with a view to grooming them for inappropriate/abusive relationships. Subsequent communication may be via email, text message, instant messaging, or mobile phone.
- For the purposes of child protection, potentially abusive images of children can be divided into:
- Unlawful material.
- Material, which although lawful, would give cause for concern and indicate that the person possessing it may pose a risk to children.

Unlawful material
An abusive image of a child under the age of 18 years old includes images in photographs, films, negatives, video tape, data stored on computers that can be converted into a photograph and

'pseudo-photographs' (images made by computers graphics, or other means, which appear to be a photograph). This also covers electronic images used by video phones and texting.

- It is for a court to decide what is 'indecent' by application of recognised standards of propriety.
- Possession of such material is an offence. Taking, showing, or distributing such material amounts to a more serious offence.

Lawful material

- Lawful material falls outside the above definition but may involve children in an indecent or sexual context. This could include pictures, cartoons, literature, or sound recordings e.g., books, magazines, audio cassettes, tapes, CDs.
- The Police Child Abuse Investigation Unit (CAIU) can provide advice generally on matters of abusive images of children to other agencies.
- Abusive images involving children in an indecent or sexual context may be found in the possession of those who use them for personal use or distributed or used with children as part of the grooming process.

Belief in 'Possession' or 'Witchcraft'

Belief in 'possession' or 'witchcraft' is widespread and not confined to countries, cultures, religions, or immigrant communities. Children involved can suffer damage to physical and mental health, capacity to learn, ability to form relationships and self-esteem.

A child/ren may be viewed as different or difficult, and this attributed to their being 'possessed' or involved in 'witchcraft'. Attempts to 'exorcise' the child may be made, that may involve severe beatings, burning, starvation, cutting or stabbing and/or isolation. This usually occurs within the child's household.

Staff should look for possible indicators and apply basic safeguarding principles including liaison with the DSL so as to be able to identify and support those at risk of this type of abuse.

Care Experienced Children

We recognise that 'care-experienced' children (commonly referred to as 'Looked After' children) may be at particular risk, both in terms of their life experiences and vulnerability and in the difficulties, they may have in recognising, or alerting people to, forms of abuse occurring in their lives. These children and young people require additional consideration for care, support, and vigilance. Staff must be alert to behaviour that is 'unusual' or a warning sign for any child, such as self-harm, repeated illness, or non-attendance. It is essential that staff do not allow the fact that the child is 'care experienced' to be an excuse for delay or non-action.

Child Abduction

It is an offence for a parent or guardian to take or send their child out of the UK without appropriate consent. Child abduction may arise in situations where a child is the victim of a forced marriage or is forced into prostitution. It is more likely to arise however, when parents of a child divorce or separate.

When staff become aware that parents have separated and there are issues regarding child custody, they should seek information as to whether there are any conditions covering the child's custody

e.g., do both parents have parental responsibility, is there a court order (such as a Child Arrangements Order or a Prohibited Steps Order), and whether there are any legal restrictions on either partner collecting the child from school.

Any concerns or allegations of child abduction or the threat of child abduction should immediately be brought to the attention of the DSL and be the subject of an urgent child protection referral.

Child Criminal Exploitation (CCE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
Indicators of CCE can include a child:
- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child on Child Abuse

Child-on-Child abuse is when children abuse other children, and this type of abuse can take sometimes take place online.
Child-on-child abuse is most likely to include, but may not be limited to:
- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- 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)
- 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 nudes and semi nude's images and/or videos (also known as sexting or youth produced sexual imagery)

- 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 (see below section on 'upskirting')
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who do not want to receive such content.

Child on Child Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex, including within intimate personal relationships between peers, or between groups of children. All staff maintain an attitude of 'it could happen here'.

Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children with SEND are three times more likely to be abused than their peers. Students who are LGBT or perceived to be LGBT, are also likely to be more vulnerable.

Sexual violence refers to rape, assault by penetration or sexual assault.

Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone or displaying pictures or photos of a sexual nature; and online activity including sharing of images or video (sexting) or making inappropriate sexual comments (this list is not exhaustive).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Harmful sexual behaviours (HSB) in children are those which are developmentally inappropriate and may cause developmental damage. When considering HSB, ages and stages of the development of children are critical factors. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma, and it is important that they are offered appropriate support.

When considering harmful sexual behaviour, the ages and developmental stages of the children involved will be considered.

Victims of sexual violence and/or sexual harassment are likely to be distressed and their educational attainment affected. This will be exacerbated if the alleged perpetrator(s) attend(s) the same school.

A Whole Service Approach

Sexual violence and sexual harassment are included in the National Online School's broader approach to safeguarding.

Sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up. Not recognising, acknowledging, or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe learning environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Well promoted, easily understood and easily accessible systems should be in place for children to confidently report abuse, sexual violence, and sexual harassment, knowing their concerns will be treated seriously, and that they can safely express their views and feedback.

Sexual violence and sexual harassment, and the wider societal context such as sexist stereotypes and language are included in staff training and age appropriate PSHE.

Providers of services to students should look out for potential patterns of concerning, problematic or inappropriate behaviour and, where a pattern is identified, consider whether there are wider cultural issues within the school that enabled inappropriate behaviour to occur and what can be done to minimise the risk of it happening again.

If a victim reports an incident, it is essential that staff make sure they 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. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual, and transgender (SEN are at greater risk).

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate and alert the Designated Safeguarding Lead.

Child Pregnancy

The legal age for consent to sexual intercourse is 16. Assumptions should not be made that teenage pregnancies at any age are as a result of consensual sexual intercourse.

In all cases of a child's pregnancy becoming apparent to staff, consideration should be given to referring the matter to the MASH in accordance with the referral procedures stated above.

Staff who have regular contact with pregnant teenagers have a responsibility to consider the welfare of both the prospective mother and her baby.

Child Sexual Abuse (CSA)

It should be noted that there are no typical families where sexual abuse occurs but there are some factors that occur in such families more frequently. These are:

- Poor or confused parent/child relationships (especially with mothers).
- Parents unavailable (especially mothers) through absence, illness or *depression.
- Families with a stepfather or *where the mother has a succession of male partners.
- Violence between the adults, *especially of a male partner towards the mother.

*These are also known key factors in situations of abuse between siblings, or by a child or young person towards another child or children.

Children under 16 years of age cannot provide lawful consent to any sexual activity, though in practice many are involved in sexual contact to which, as individuals, they may have agreed.

Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CSE indicators above, indicators of CSE can include a child:
- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child Victims of Trafficking

Trafficking is defined as 'the recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, or use of force or other forms of coercion for the purpose of sexual or commercial exploitation or domestic servitude' (AFRUCA/ NSPCC). Trafficking in people involves crimes, spanning a variety of countries and involving an increasing number of victims, who can experience considerable suffering. There are many factors that may indicate that a child has been trafficked, which can include:

- going missing, or missing for periods of time
- a history with missing links and unexplained moves
- attending for a term or so before disappearing (schools need to look out for patterns of registration and de-registration)
- has limited freedom of movement, is withdrawn or refuses to talk
- is known to beg for money; has no money/other financial resources, but has a mobile phone or is driven around by an older male/boyfriend
- shows signs of physical or sexual abuse, signs of sexual behaviour or language and/or has contracted a sexually transmitted disease
- has not been registered with or attended a GP practice

Child protection procedures should always be applied where there is suspicion that a child may be being trafficked and Police / Children's Services must be informed.

For helpful additional guidance see the Trafficking Toolkit (www.crimereduction.gov.uk/toolkits)

Children Missing from Education (CME)

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveler families.
- Come from the families of service personnel.
- Go missing or run away from home or care.
- Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

We will follow statutory guidance and our internal procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including CSE and CCE, and to help prevent the risks of going missing in the future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as CCE, CSE, travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

The National Online School has an Attendance Policy in place detailing what to do if a child is missing from education.

The designated safeguarding lead will report all children missing from education for 10 consecutive days to social care and/or the relevant statutory CME team where required.

Children who are Lesbian, Gay, Bi, or Trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself safeguarding issue, however, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with staff.

Contextual Safeguarding

Contextual safeguarding is an approach to considering risk that stems from outside of the family home. It seeks to create a response to forms of abuse by:

- Targeting the contexts in which that abuse occurs, from assessment through to intervention.
- Use a framework to address extra-familial risk through the lens of child welfare, as opposed to crime reduction or community safety.
- Utilise partnerships between children's services and agencies who have a reach into extra-familial contexts (such as transport providers, retailers, youth workers, residents' associations, parks and recreation services, schools and so son).
- Measure success with reference to the nature of the context in which harm has been occurring, rather than solely focusing on any behaviour changes displayed by young people who were at risk in those contexts.

Work to develop contextual safeguarding, happens in two tiers. The first tier involves acknowledging context more explicitly in all work with children and families. This could include talking with parents about the context in which they are trying to parent their child and engaging young people in activities where they can explore their feelings of safety in public, as well as private, spaces.

At the second tier, work is undertaken to create resources and approaches for assessing and intervening with peer groups, schools and public spaces identified as ones in which young people have experienced abuse. At Tier 2, therefore, we not only recognise the contexts in which young people might experience harm but work actively to address them.

Further information can be found here: https://contextualsafeguarding.org.uk/

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school as per the arrangements under Operation Encompass (usually the designated safeguarding lead) before the child or children arrive at school the following day. The DSL will then oversee the provision of support according to the child's needs, as well as update safeguarding records regarding their circumstances.

Drug and Alcohol Using Parents

- Children of parents who abuse drugs or alcohol may be at risk of harm either directly, e.g., access to dangerous substances, or from a lack of boundaries, parental warmth and support and discipline.
- 70% of children taken into care have parents who are suspected of substance abuse.

- Not all parents who misuse drugs or alcohol mistreat their children, however it is known that there is an increased risk of violence in families where parent/carers abuse substances and the children who are most vulnerable are those whose parents are violent, aggressive, neglectful, or rejecting.
- Any concerns of this nature should be brought to the attention of the DSL and discussed with the MASH to decide whether a referral needs to be made.

E-Safety

Online safety is taken very seriously at TCES National Online School and robust systems are in place to ensure appropriate filters and monitoring systems are in place and all staff are aware safeguarding issues can manifest themselves via child-on-child abuse. All online learning sessions should take place via Microsoft Teams (this is a secure platform where outsiders should not be able to access the session) and tutors are advised that all lessons must be recorded and that a parent/carer must be present in the student's home throughout allocated learning hours. If a parent/carer is not able to be present during allocated learning hours, this will be subject to risk assessment reviewed by the Head of National Online School, DSL and TCES Head of Safeguarding, and written permission from the parent/carer acknowledging.

The main areas of risk for our students can be summarised as follows:

Content: Being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

Contact: Being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: Personal online behaviour that increases the likelihood of, 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.

Commerce: Risks such as online gambling, inappropriate advertising, phishing and or financial scams.

For more information – see TCES e-Safety/Acceptable Use/ICT Policy

Fabricated or Induced Illness

- Fabricated or induced illness (FII) in a child is a condition whereby a child suffers harm through the deliberate action of her/his main carer, and which is duplicitously attributed by the adult to another cause.
- There are 3 main and not mutually exclusive ways of the carer fabricating or inducing illness in a child:
- Fabrication of signs and symptoms and fabrication of past medical history
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters, documents, and specimens of bodily fluids
- Induction of illness by a variety of means.
- Harm to the child may be caused through unnecessary or invasive medical treatment, which may be harmful and possibly dangerous, based on symptoms that are falsely described or deliberately manufactured by the carer and lack independent corroboration.
- The child may additionally suffer emotional harm through limitations placed on her/his development and social interaction e.g., overprotection, limitation of exploration and learning, prevention from participation.

Female Genital Mutilation (FGM)

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:
- A student confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/student already being known to social services in relation to other safeguarding issues.
- A girl:
- Having difficulty walking, sitting, or standing, or looking uncomfortable.
- Finding it hard to sit still for long periods of time (where this was not a problem previously.)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE.
- Being repeatedly absent from school or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

Potential signs that a student may be at risk of FGM include:
- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
- A girl:
- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society.
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion).
- Being unexpectedly absent from school.
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e., we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- Speak to the student about the concerns in a secure and private space.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- Refer the student to the internal Clinical team as appropriate.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Migrant Families and those Seeking Asylum in the UK

The number of migrant children in the UK has increased in recent years. Some move here with family/relatives or other adults, and some arrive unaccompanied.

- These children may be vulnerable for a variety of reasons, which may include:
- Insecurity about their legal status, place of residence and carers.
- Separation from significant family members, sometimes against their will.
- Cultural and language difficulties.
- Trauma connected with previous experiences in countries of origin and the circumstances of their departure, including child abuse, being forced to become child soldiers, or subjected to female genital mutilation.
- The child may have been moved illegally and be under severe pressure to give a false account of themselves, or to keep secrets.
- Evidence shows that unaccompanied children or those accompanied by someone who is not their parent are particularly vulnerable.

The possibility that some of these children may be privately fostered should also be borne in mind and if suspected, referred to the relevant Children's Social Care team.

Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is vocal or active opposition to fundamental British values, such as 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.

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 of terrorism 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. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our students to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alerted to changes in students' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:
- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities, they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures.

Self-Harm

- Self-harm, self-mutilation, eating disorders, suicide threats and gestures by a child must always be taken seriously and may be indicative of a serious mental or emotional disturbance.
- The possibility that self-harm, including a serious eating disorder, has been caused or triggered by any form of abuse or chronic neglect should not be overlooked.
- This may justify a referral to the MASH for an assessment as a child in need and/or in need of protection. A staff member who is in doubt about the required response should seek advice from the DSL.
- Consideration must also be given to protect children who engage in high-risk behaviour which may cause serious self-injury such as drug or substance misuse, running away, partaking in daring behaviour such as running in front of cars etc., all of which may indicate underlying behavioural or emotional difficulties or abuse.

It is good practice, when a child or young person is known to have either made a suicide attempt or been involved in self-harming behaviour, to undertake a multi-disciplinary risk assessment, along with an assessment of need.

So-called 'Honour-Based' Abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

Social Exclusion

Many families are multiply disadvantaged and face chronic poverty and social isolation. Additionally, they may experience problems associated with living in disadvantaged areas, e.g., high crime rates and poor services, as well as limited employment opportunities. Many lack a wage earner. Racism and racial harassment may provide further stress to families in these circumstances.

Poverty may mean the children live in crowded or unsuitable accommodation, have poor diets, health problems or a disability, are vulnerable to accidents and may lack ready access to educational and leisure facilities.

Children may be indirectly affected through the association of this social exclusion with parental depression, learning disability and long-term health problems.

Referrals to the MASH should be made if the cumulative impact of the child's circumstances indicates that s/he is a child in need or is suffering or at risk of suffering significant harm.

Students with Special Educational Needs and Disabilities

We recognise that students with special educational needs and disabilities (SEND) can face additional safeguarding challenges, and these are discussed in staff training. These additional barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration.
- Students with SEND can be disproportionately impacted by things like bullying- without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Safeguards for disabled students are essentially the same as for non-disabled children and should include ensuring and enabling them to:

- Make their wishes and feelings known.
- Receive appropriate personal, health and social education, including sex education.
- Raise concerns.
- Have a means of communication and a range of adults with whom they can communicate.
- Disabled students must receive the same level of protection from harm as other students and the same procedures are to be followed.

Temporary Accommodation and Transient Lifestyles

Placement in temporary accommodation, often at a distance from previous support networks, can lead to individuals and families becoming disengaged from services and support systems.

Families who have experienced homelessness and are placed in temporary accommodation by boroughs may have very transient lifestyles.

Families in which children are harmed may move home frequently and avoid contact with caring agencies, so that no single agency has a complete picture of the family. Along with other indicators of potential risk, the following circumstances associated with some mobile families are a cause for concern:

- Child/ren not consistently registered with a GP.
- Child/ren attending hospital Emergency Departments frequently for treatment, rather than engaging with primary health services.
- Child/ren missing from a school roll, or persistently not attending.
- Information 'patch worked' across a network of agencies with no single agency holding the whole picture of a family history.
- Where there are outstanding child welfare concerns, unusual extended non-school attendance may indicate that the family has moved out of the area.

Young Carers

A 'young carer' is an individual aged under 18 who has a responsibility for providing primary or secondary care on a regular basis for a relative, often a single parent, or very occasionally a friend, whose needs may arise from:
- Physical or sensory disability.
- Learning disability or mental health related difficulty.
- Chronic or terminal illness.
- Misuse of drugs or alcohol.

Young carers are frequently involved in shopping, cooking, cleaning, ironing, washing clothes, budgeting the household income, and nursing responsibilities including provision of intimate personal care, as well as emotional support.

This situation often leads a young person's needs being overlooked and may on occasions give rise to abusive experiences, which a young carer is reluctant to address for fear of intervention and breakup of the relationship.

If there is any concern that a young carer is at serious risk of neglect, abuse, or harm, this must be referred to the MASH and if appropriate, a strategy discussion held.

Use of the Internet

The internet has become a significant tool in the distribution of abusive images of children, enabling ready access to such material. It may be downloaded and printed off in picture form or stored electronically on the hard drive of a computer, CD Rom, USB etc. Some adults use it to establish contact with children with a view to grooming them for inappropriate or abusive relationships. This may be accomplished through 'chat rooms' or contact by e-mail and may constitute an offence under The Sexual Offences Act 2003.

- Children may be encouraged to access abusive images of children themselves through using apparently innocent words in an internet search engine.
- As part of their role in preventing abuse and neglect, LSCBs or local safeguarding arrangements may offer activities to raise awareness about safe use of the internet and be a key partner in the development and delivery of training and education programmes with the Child Education and Online Protection Centre (CEOP). See www.ceop.gov.uk
- CEOP has also set up its own website which has been designed and written specifically for young people. It contains games and up to date information on having fun, staying in control and being safer online as well as details on how to report problems. See www.ceop.gov.uk/children and young_people.asp.

- The designated safeguarding lead should inform Police if they are aware that:
- a child has been the recipient of any suspicious contact through the internet or in receipt of pornographic material, as described above.
- a person may be in possession of abusive images of children or have placed/accessed abusive images of children on the internet.
- a child may have been inappropriately contacted or approached, directly or via the internet:
- any individual involved in the creation, distribution, or possession of abusive images of children may also be actively involved in their abuse. Police are expected to check whether anyone involved has access to children, including family and work settings, or is known to the MASH.
- a strategy discussion must be held whenever it is suspected a parent or carer of children or someone with access to children in other contexts:
- is in possession of child abusive images of children; and/or has taken, shown or distributed child abusive images of children; and/or has used the internet to make inappropriate approaches to children.

Upskirting

The Voyeurism Offences Act, which was commonly known as the Upskirting Bill, was introduced on 21 June 2018. It came into force on 12 April 2019.

- Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear).
- Transportation services have reported a rise in the offence however, it can occur anywhere and involve any gender.
- The new law will capture instances where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress, or alarm.
- The perpetrator can face up to two years imprisonment if found guilty of the offence.
- The law protects those who are victims of the offence from being named in the media
- Staff must report any concerns that a student/student has experienced this to the DSL.

Additional Risk Considerations

Children are most commonly abused by someone known to them or close to them within a relationship of trust, responsibility, or authority such as a relative, neighbour, family friend, teacher, leader, peer member or acquaintance. They may then be placed under considerable pressure not to reveal what has been happening and may feel guilty and responsible for their involvement.

Part Two: Child/Adult Protection

Child/Adult protection is a part of safeguarding and promoting welfare of our students. It refers to the activity that is undertaken to protect specific students who are suffering, or are likely to suffer, significant harm. Due to a minority of students receiving services from the National Online Schools being aged 18 or over, there are two legislative frameworks to consider in the protection of our students, namely the Children Act 1989 and the Care Act 2014. Whilst these legal frameworks are different, the nature of the response from statutory agencies has many similarities.

Working Together to Safeguard Children 2018 sets out how organisations and individuals should work together to safeguard and promote the welfare of children.

The Care and Support Statutory Guidance 2014 sets out how organisations and individuals should work together to safeguard and promote the welfare of adults.

Staff must be aware that:

- It is not the responsibility of staff to investigate allegations or suspected cases of abuse
- Procedures are in place for dealing with allegations against staff members and full details of these can be found in the National Online School's Dealing with Allegations Against Staff policy.
- Staff must not take any action beyond that agreed in the procedures established by the National Online School or the TCES and the relevant Children's Services.
- Staff cannot always promise a student complete confidentiality - instead they must explain that they may need to pass information to other professionals to help keep the student or others safe
- The National Online School must ensure that parents are aware that the full texts of this safeguarding policy and associated policies are available on request

Training

All staff within the National Online School receive safeguarding training which includes information regarding child/adult protection and updates as appropriate that equip them with the knowledge and skills necessary to carry out their responsibilities; this training will be refreshed at yearly intervals as a minimum.

The DSL for the National Online School, TCES Head of Safeguarding and the CEO will refresh their safeguarding training at appropriate intervals, to be able to discharge their duties competently. This training will include inter-agency working. In addition, all staff will be given an annual update to ensure that they are fully informed on updated guidance and safeguarding practice.

Certificates will be placed on individual staff files on completion of any training provided.

Managing Child/Adult Protection Concerns

- It is essential that any abuse issues are not trivialised or exaggerated and that the proper steps are followed.
- Please be aware that words and actions may be open to misinterpretation and therefore you should take great care to avoid situations in which your own words or actions could be misunderstood.

- You are responsible for ensuring that abusive peer activities such as cyberbullying do not occur or are actively addressed.
- All steps must be taken to ensure that the National Online School's practices are safe for students and staff. Any concerns that you may have should be dealt with or reported swiftly.

You may become aware of possible abuse/welfare concerns in various ways. You may:

- see it happening
- suspect or have concerns because of signs such as those listed in 'Identifying abuse'
- have concerns reported to you by a student or third party.

It is particularly important to respond appropriately and to remember always that the best interests of the child or young person - and the need for any abuse to stop - come before the interests of anyone else, including the TCES Group, National Online School or a potential abuser. Any member of staff with an issue or concern relating to Child Protection should immediately discuss it with the DSL or deputy DSL. It should also be made clear to children that confidentiality cannot be guaranteed in respect of child protection issues.

NOTE: See 'Listening to Children' – Section II

The Designated Safeguarding Lead

There is a DSL based in the National Online School and a deputy to act in their absence (see key contact details). Should they both be absent or unavailable, the matter must be referred to the TCES Head of Safeguarding. Whilst new staff are awaiting their DSL training, the TCES Head of Safeguarding will hold the role of DSL.

The DSL Role includes:

- referring cases of suspected abuse to social care
- referring to the Head of Safeguarding if an allegation is against a member of staff
- referring cases where a crime has been committed to the police (where appropriate)
- liaising with the TCES's Head of Safeguarding where safeguarding enquiries and/or police investigations are in process
- acting as a source of support, advice, and expertise to staff on matters of safety and safeguarding and when deciding to make a referral by liaising with relevant agencies.

Immediate Action

There is a difference between immediate danger and concern for a student. If an individual is perceived to be in immediate danger or at risk of harm a referral should be made to Children's Services/Adult's Services (dependent on their age) and/or the police immediately (anyone can make a referral). Concerns for a student must be raised with the National Online School's DSL.

Where a concern is reported to/identified by a member of staff, the first priority is to establish whether the student is in need of medical attention and/or protection:

- If urgent action is required, medical assistance should be obtained if needed and an immediate referral made to the Local Authority and/or the police.

- If a child is in need of protection, police can initiate a police protection order (PPO) in cases of emergency, while MASH can apply to a court for an emergency protection order (EPO)
- The law also allows staff to take all reasonable steps to offer immediate protection to a child at risk of harm e.g., from a violent or incapacitated parent.

Action by Person Initially Identifying/Receiving a Concern or Allegation

Any member of staff receiving details of a concern or allegation should:

- respond with tact and care (remembering to keep an open mind)
- listen and treat the concern seriously, avoiding expressions of shock or disbelief
- communicate as appropriate to the age and understanding and any communication or language difficulties of the individual reporting
- allow the student to tell their own story. Research has shown that this initial telling can be the best therapy if they are able to 'talk it out'
- avoid leading questions
- avoid expressions of sympathy that may pre-judge issues of potential abuse
- avoid any promise of confidentiality but reassure the student that the information will only be passed to those who have a 'need to know' in order to support safeguarding processes.

Staff should be aware that:

- the way in which you talk to a student can have an effect on the evidence which is put forward if there are subsequent criminal proceedings
- while information must be gathered as accurately and thoroughly as possible when recording an allegation made by a student, it is important to attempt to minimise the number of times they have to repeat themselves
- the National Online School staff are only the first in a series of people who will talk to them in the course of an investigation. Having to repeat themselves unnecessarily may be traumatic for the student. While child/adult protection procedures are being followed, the needs of the student may be overlooked and the procedure itself may be experienced by them as abusive.

If a student chooses to tell a member of staff about possible abuse, there are a number of things that can be done to support the student:

- stay calm and be available to listen
- listen with the utmost care to what the student is saying, and check with them that you have heard what they have said correctly
- question normally without pressurising
- don't put words in the student's mouth but note the main points carefully
- reassure the student and let them know that they were right to inform us
- inform the student that the information may have to be passed on.

The person receiving the concern should not:

- interrupt the student reporting when they are recalling significant events
- make assumptions or interpretations
- make suggestions or offer alternative explanations; this could be construed as 'coaching' or attempting to dismiss or minimize what is being said

- use leading questions e.g., 'Did they do …. to you?' or 'What did they do next?' Use open questions only, such as 'What happened?' or 'Do you have anything else to tell me?'
- Do not attempt to investigate any suspicion of abuse. Only sufficient information should be sought to clarify whether a concern should be referred to Children's or Adult's Services and that decision lies with the DSL.
- Do not criticise an alleged abuser. The student may love him/her and be very protective of the relationship or confused about their own role in the abuse. There may also be the possibility of reconciliation.
- Do not ask the student to repeat it all for another member of staff.

The person receiving a concern should:

- record in writing the information (if applicable, in the student's own words), including times, dates, place of incident(s), persons present and what was said.
- make a note of any accompanying non-verbal behaviour and how the information was imparted.
- be careful to differentiate between fact, observation, allegation and opinion.
- sign and date the written record.

Staff should be aware that the notes you make may be disclosed in any subsequent prosecution. You may also be called to give evidence in court proceedings and may be asked to refer to your notes.

Any member of staff identifying or receiving details of a concern, must immediately:

- report the matter to the DSL their deputy or appropriate substitute.
- make a written record of decisions made and action taken.
- Always act in the best interest of the student.

Initial Action by the DSL

- obtain written details, signed, and dated, from the person who initially identified or received the concern (not from the student reporting the concern) and signed and dated by that person. This should be entered on to MyConcern by the reporting person as soon as possible and by the end of the school day
- countersign and date the written details
- record any information about times, dates and location of incident(s) and details of any potential witnesses.
- **DO NOT** attempt to investigate. Inappropriate questioning could jeopardise a safeguarding response or criminal investigation and may cause immediate distress to the student.

Initial Consideration of Concern

The member of staff identifying or receiving the concern and the DSL should:

- Discuss the concern and all available information in order to decide on the most appropriate course of action.
- If there is any doubt about the action to be taken, the DSL should seek advice internally from the TCES's Head of Safeguarding.

Consent

- In general, any concerns about a student's welfare should be discussed with the family and, where possible, agreement sought to make a referral to Children's or Adult's Services, provided this does not increase the risk of harm to the student or lead to the potential withdrawal of a statement or destruction of evidence.
- The student's views should also be considered in deciding whether to inform the family, particularly where he or she is sufficiently mature to make an informed judgment, with the same provisos of due care.
- Where there is doubt about involving the student's family, the DSL should clarify with Children's/Adult's Services (and TCES 's Head of Safeguarding where appropriate) whether, and if so when and by whom, the parents/carers should be told about the referral and what action to take where consent is refused. It will not be necessary to disclose personal details of the student and family unless the advice confirms that a referral is needed. In either case, the DSL must keep a record of the advice received and who provided it.
- Action to ensure the safety of students must respect the rights, privacy, and dignity of parents/carers as far as possible without jeopardising the student's safety, recognising the stress that such interventions can cause and seeking to ensure that families are supported and services to support parenting/care are put in place.

Referral to the relevant Multi-Agency Safeguarding Hub (MASH)

Where the DSL / Head of Safeguarding decide that a concern needs to be referred to the relevant Local Authority, he/she should provide as much information as possible about the nature of the suspicions, the student, and the family, including:

- Full names, date of birth and gender.
- Family address.
- Name(s) of person(s) with parental responsibility or primary carer(s).
- Names and dates of birth of other household members, if known.
- Any need for an interpreter, signer, or other form of communication.
- Any special needs.
- Any current and previous concerns, significant events or involvement of other agencies in the child's life.
- Developmental needs and parents'/carers' ability to respond to these needs (where known).

If urgent action or referral is required, the collation of such information must not be allowed to cause delay:

- The DSL must telephone the MASH where the student lives or is at the time.
- The referral should be made immediately if urgent action is required but within the same day as the allegation was reported regardless. The DSL should agree with the person receiving the referral what the student and parents/carers should be told and by whom.
- Where the referral is taken by a member of the MASH administration team, the DSL should seek to discuss the issue with someone from MASH.
- The referral should be confirmed in writing within 24 hours. The MASH should then acknowledge the written referral within one working day of receipt.
- The DSL must record the decisions taken and reasons, together with the names of those involved in making those decisions. This record needs to be timed, dated, and signed by all parties.

It should always be remembered that formal referrals from professionals cannot be treated as anonymous, and a parent/carer will ultimately become aware of the identity of the referrer.

Concerns Identified or Reported out of Office Hours

- If a concern is identified or reported outside normal office hours, the DSL should contact the Local Authority Emergency Duty Team or the local police station. Written confirmation of the referral should be sent to the MASH the next working day.

Action After Referral

- Following referral, the MASH should, within one working day, consider the next course of action, record their decision on a referral and information record and notify the DSL.

Outcome of referral to MASH or subsequently to the Child/Adult Protection team

The decision by MASH or Child/Adult Protection team will be either:
- No further action
- A recommendation for an 'Early Help' intervention (or similar intervention with regards to adult students)
- The DSL should record the reasons for this decision and discuss who is best placed to inform the student if age appropriate and/or parent/carer.
- A Social Worker to conduct an assessment/enquiry under the Children Act 1989 or Care Act 2014 (dependent on the student's age).
- This assessment may require further information from and discussion with the National Online School. The outcome will be recorded on an assessment record.
- Strategy discussion/meeting - an immediate multi-agency strategy discussion should take place where the information clearly indicates that the child or adult has suffered or is at risk of harm.

Social Work Assessment/Enquiry

The outcome of an assessment will be either:
- No further action
- A recommendation for an 'Early Help' intervention (or similar intervention with regards to adult students)
- The DSL should record the reasons for this decision and discuss who is best placed to inform the child if age appropriate and/or parent/carer.
- The child is in need of additional support - this may require a plan in which education is likely to be asked to assist.
- Strategy discussion/meeting - an immediate multi-agency strategy discussion should take place where the information clearly indicates that the child or adult has suffered or is at risk of harm.

Strategy Discussion / Meeting

If a strategy discussion/meeting is required, it may take the form of a meeting or a series of telephone calls. This should be convened by the relevant Local Authority, who will consider involving the following:

- Representative from the appropriate police unit(s) (usually the Child Abuse Investigation Team or 'CAIT' with regards to child students).
- DSL and/or other member of staff with knowledge of child.
- Manager from Children's / Adults Services.
- Social worker for the student.
- Other authorities/agencies as appropriate in cross border cases.
- Other authorities/agencies as appropriate e.g., health.

The strategy discussion/meeting should consider:

- the information provided about the circumstances and context of the concern.
- whether any individuals are likely to be at risk.
- whether it is necessary to review any previous concerns.
- whether it is necessary to undertake further interviews with individuals.
- the response to the student's parents/carers and to the student (if age appropriate).
- appropriate support for the student and their family.

The strategy discussion/meeting should decide whether there should be:

- enquiries by the Local Authority Children's Services under section 47 or section 17 of the Children Act 1989 (or s.42 of the Care Act in relation to adult students);
- related police investigations into possible criminal offences.
- no further action.

If the strategy discussion/meeting concludes that there should be an investigation by police and/or the Local Authority Children's/Adult's Services, timescales and dates for future meetings should be agreed and tasks allocated.

If the decision of the strategy discussion/meeting is that there should be no further action, the concerns may be referred to alternative agencies, including the school, for consideration of providing services to the student and family as part of an 'Early Help' approach to intervention.

Minutes of the strategy discussion/meeting should be given to those taking part either immediately or as soon as possible thereafter. The DSL and/or other member of staff involved in the discussion/meeting should make a note of any actions required by the National Online School / TCES.

Notification of Interested Persons

The Police or a strategy discussion may decide that child/adult protection enquiries or criminal investigation would be hindered by an approach to parties at an early stage or that certain information should not be divulged to them. The DSL should agree who is to be informed, by whom and what information should be given.

Action by Staff during further assessment / enquiry and/or Criminal Investigation

- The MASH and/or the Police may ask for assistance, including the release of relevant information in order to assist their enquiries/investigation.

- Section 17 of the Children Act 1989 places a duty on organisations to assist a Local Authority exercising its duty to provide support and services to children in need.
- Section 47 of the Children Act 1989 places a duty on organisations to assist a Local Authority making enquiries into cases of children believed to have suffered or be at risk of significant harm.
- Section 42 of the Care Act 2014 places a duty on organisations to assist boroughs making enquiries into cases of adults believed to be 'at risk'.
- The DSL should check that the MASH and/or Police have requested consent for the information to be shared when a request is received for any personal or sensitive information about a student, other individuals, or members of staff.

Consent will not be needed where:
- it is likely to increase the risk of harm to a child or other person.
- consent is refused but the child/adult welfare concerns override the duty of confidentiality.
- seeking consent is likely to impede a criminal investigation. The DSL should monitor the progress of the case, by seeking regular updates from the Police and/or the Local Authority.
- The DSL should keep a record of all information collected, decisions made, and actions taken. This record will include minutes of any strategy discussions/meetings attended. It should be noted that all records may need to be disclosed under the rules on disclosure in criminal investigations.
- Where the DSL is unsure about the legality of sharing information with any agency, advice should be sought from the TCES Head of Safeguarding who will provide advice or seek the relevant legal advice.

Police Interviews with Students – Appropriate Adults

Whilst it would not be common for the National Online School to support interviews with students as part of child or adult safeguarding enquiries, where students are requested to be interviewed by the Police, staff should inform the Head of National Online School. Staff should be aware of the requirement for children to have an 'Appropriate Adult'.

An 'Appropriate Adult' may include the parent/carer for that student or, if the student is a 'looked after child', a person representing that Local Authority. It could also include a social worker of a Local Authority. Staff should notify the Head of Safeguarding about any requests for students to be spoken to by the Police where the National Online School is involved.

Further information can be found in the Statutory guidance - PACE Code C 2019.

Challenging Responses to Concerns/Allegations

If at any stage a member of staff believes that a child/adult protection concern is not being dealt with properly, he/she should report their concerns to the TCES Head of Safeguarding / CEO (where appropriate) and to challenge the response given to those concerns if they remain unsatisfied. Should barriers to help and support for a particular student believed to be at risk stem from multi-agency working, consideration will be made around implementing escalation procedures as issued by the relevant Safeguarding Children Partnership / Safeguarding Adults Board.

Media
Child/Adult protection issues, including allegations against staff, may attract local and/or national media attention, depending on the seriousness of the matter or particular issues of interest at the

time. This needs to be managed in a sensitive manner in order to minimise any distress to those involved.

Where a matter has attracted or is likely to attract media attention, advice must be sought from the CEO, who will consult with the relevant Local Authority media comms dept and other agencies as appropriate e.g., the Police. No staff member may make an informal or formal response to a media enquiry without the express permission of the CEO.

Record Keeping

It is essential that accurate records are kept where there are any concerns about the welfare of a student (e.g., referrals, meeting minutes, reports). These must be kept securely and separately from a student's educational records in a separate safeguarding file.

Staff must keep the DSL informed of:
- poor attendance and punctuality (where relevant).
- concerns about appearance and dress (where relevant).
- marked changes in, or unusual behaviour.
- concerns about health and emotional wellbeing.
- unexplained deterioration in educational progress.
- discussions with parents about concerns relating to their child.
- concerns about home conditions or situation.
- concerns about child-on-child abuse (including bullying).
- concerns such as unknown adult(s) meeting a student regularly after school, or issues raised by a child about involvement in illegal drug use, crime, or street gangs.

This recording system must be regularly maintained by the DSL. When a student no longer receives a service from TCES National Online School, the records must be sent under separate cover to the relevant Local Authority or receiving school (where appropriate). The designated safeguarding lead should ensure any safeguarding file is transferred to the new school or college as soon as possible, and **within 5 days** for an in-year transfer or **within the first 5 days** of the start of a new term to allow the new school or college to have support in place for when the student arrives. Photocopies of the records may be retained until receipt is confirmed by the student's new school.

All information written about children, or allegations made by children, must be kept to objective comments, verbatim accounts, and factual information.

Access to Safeguarding Records

Under the Data Protection Act 1998, any student who has a safeguarding file has a right to access it unless to do so would affect their health or well-being or that of another person or would be likely to prejudice an ongoing criminal investigation.

Parents/carers do not have an automatic right to see all the information held in safeguarding records. Information can be withheld if disclosure:
- Could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person; or
- Could reveal that the student or another person has been a subject of or may be at risk of abuse, and the disclosure is not in the best interests of the student; or
- Is likely to prejudice an ongoing criminal investigation; or

- The information about the student also relates to another person who could be identified from it or the information has been given by another person who could be identified as the source, unless the person has consented to the disclosure or the person providing the information is an employee of the establishment or the Local Authority.

If an application is made to see the whole safeguarding file, advice should be sought from the DSL who will discuss with the Head of Safeguarding.

When agreement is reached to disclose information, all third-party information must be removed, or consent sought for its disclosure from the person concerned. For example, all identifying information about other children or members of the public who have shared information about the child must be removed before disclosing information.

Parents/Carers (i.e., those with parental responsibility in law) are entitled to see a child's safeguarding file, on behalf of their child, with the same exceptions applying as to the child's right to access. An older child may be entitled to refuse access to their parents. The school should take advice about information sharing with parents if they have particular concerns about doing so.

If a parent makes a request to access the file on the child's behalf, it should be done in writing.

Part Three: Safer Recruitment (Recruitment, Selection and Disclosure)

Introduction

The National Online School adopts a consistent and thorough process of safe recruitment in order to ensure that those recruited to work with our students are suitable. This includes ensuring that safe recruitment and selection procedures are adopted which deter, reject, or identify people who might abuse children or are otherwise unsuitable to work with them.

Our safer recruitment practice includes those persons who may not have direct contact with children, but because of the nature of their role will be seen as safe and trustworthy.

Permanent Staff Recruitment Procedure

Stage 1 Advertising

The Head of National Online School should complete a recruitment request form with details for the role requesting to be filled, and once it is authorised, collaborate with the People Team to decide a timetable for the recruitment process of the role required. The job description, person specification and other documents to be sent to applicants should be reviewed and updated as necessary. It should be ensured that the application form seeks all relevant information and includes relevant statements about references etc. The application form should also include the disclosure of any criminal convictions and a question relating to whether the candidate currently has a DBS disclosure and if this is available on the update service.

All recruitment advertising material should contain a policy statement to the effect that Safer Recruitment practice is followed.

If the role is to be advertised through agencies, then those suitable agencies on the approved agency list will be contacted by the People Team and provided with the timetable, job description and person specification and asked to source suitable candidates.

All information given to an interested applicant should highlight the importance placed by TCES on rigorous selection processes and should stress that the identity of the candidate, if successful, will need to be checked thoroughly, and that where a Disclosure and Barring Service (DBS) check is appropriate, the person will be required to complete an application for a DBS disclosure straight away. Adverts will also state whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974.

The job description should clearly set out the extent of the relationship with, and the degree of responsibility for, children and adults at risk with whom the person will have contact. To this effect, the advert will include the safeguarding responsibilities of the post as per the job description. The person specification should explain:

- The qualifications and experience needed for the role.
- The competences and qualities that the applicant should be able to demonstrate.
- How these will be tested and assessed during the selection process

.
The application form should ask for:

- Full personal information, including any former names by which the person has been known in the past; and
- A full history of employment, both paid and voluntary, since leaving school, including any periods of further education or training
- Details of any relevant academic and / or vocational qualifications
- Details of references/referees
- A declaration, as appropriate for the position, that the person has no convictions, cautions, or bind-overs or if they have, to provide details in a sealed envelope.

Stage 2 Referencing

The application form should request both professional and character references, one of which should be from the applicant's current or most recent employer. Additional references may be asked for where appropriate (and to cover the last 5 years). For example, where the applicant is not currently working with children and/or adults at risk, but has done so in the past, a reference from that employer should be asked for in addition to that from the current or most recent employer if this is different.

Wherever possible references should be obtained prior to the interview so that any issues of concern raised by the reference can be explored further with the referee and taken up with the candidate during interview. Gaps in employment should also be discussed during interview.

References should contain objective verifiable information and in order to achieve this, the TCES reference pro-forma with questions relating to the candidate's suitability to work with children and/or adults at risk should be provided. This includes the referee being asked to confirm whether the applicant has been the subject of any disciplinary sanctions and whether the applicant has had any allegations made against him / her or concerns raised which relate to either the safety or welfare of children and young people or about the applicant's behaviour towards children or young people. Details about the outcome of any concerns or allegations should always be sought.

If the applicant claims to have specific qualifications or experience relevant to working with children which may not be verified by a reference, the facts should be verified by making contact with the relevant body or previous employer and any discrepancy explored during the interview.

For contractors, the above approach will be taken prior to offering work.

Stage 3 Shortlisting

All applicants should be assessed equally against the criteria contained in the person specification without exception or variation.

Safer recruitment means that all applications should additionally be:

- Checked to ensure that they are fully and properly completed. Incomplete applications. should not be accepted and should be returned to the candidate for completion.
- Scrutinised for any anomalies or discrepancies in the information provided.
- Considered with regard to any history of gaps, or repeated changes, in employment, or moves to supply work, without clear and verifiable reasons.

Shortlisted candidates should be contacted to arrange a mutually suitable time for interview. Once this is agreed an interview pack should be sent to the candidate. This pack should include:

- An invitation to interview letter including the list of documents to bring.
- ID requirements, specifying that 3 forms of ID are required with at least 1 of:
    - photographic ID.
    - proof of Date of Birth.
    - proof of address (dated within the last 3 months).
- Job description and person specification.
- Details on the company and specific site.
- A map and directions of how to get to the interview location.
- Policy on employment of ex-offenders.
- Policy on Diversity and Equal Opportunities,

Candidates should also be asked to bring original or certified copies of documents confirming any necessary or relevant educational and professional qualifications. If the successful candidate cannot produce original documents or certified copies written confirmation of his / her relevant qualifications must be obtained from the awarding body.

With the guidance of the People Team, the interview panel should consider carrying out an online search (including social media) as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the National Online School might want to explore with the applicant at interview.

Stage 4 Interviewing

A panel of interviewers should be arranged with available times and dates agreed. The panel should consist of at least two people who have undertaken Safer Recruitment Training and the authority to appoint, as well as appropriately qualified senior staff (e.g., for a SENCo role, one panelist must hold a NASENCo qualification), and for more senior roles the panel should consist of 3-4 people. The panel should meet before the interviews and agree the interview format, issues and questions, assessment criteria and standards.

Questions should be set which test the candidate's specific skills and abilities to carry out the job applied for.

The candidate's attitude towards working with children and/or adults at risk in general should be tested and also their commitment to safeguarding and promoting the welfare of service users in particular.

Any gaps and changes in employment history should be fully explored during the interview, as should any discrepancies arising from information supplied by the candidate or by the referee.

TCES has a two-section interview with the first stage being standard questions regarding suitability of the candidate to work with children and young people. This section specifies that the application form should be scrutinised as a check for gaps in employment and any gaps should have the reason for them written on the form including any breaks for raising a family.

The first part of Section 1 asks the candidate to confirm that they are physically and mentally fit to perform the role, and to confirm that they are able to fully understand all questions put to them in the interview process both verbally and in written form, or if there if anything that would affect their ability to do so.

It also informs them that they will be required to complete a medical questionnaire and may be required to complete a medical with a medical professional if successful. Another question asks for confirmation that the candidate has understood the need for disclosing any criminal history and the full list of possible sanctions must be read out and the candidate asked to confirm that they have understood the list and have disclosed anything on the list. It is at this stage that any previous convictions, cautions, reprimands, warning, police arrests or Schedule 5 notices including those with no further action taken.

It is TCES policy that any non-disclosure at interview of any such information as a potential case of gross misconduct and may lead to the termination of the contract of employment at a later date. A further question asks if there is any other information that the candidate should disclose which could affect the candidate's employment or reflect badly on the company. It is TCES policy that any non-disclosure at interview of any such information as a potential case of gross misconduct and may lead to the termination of the contract of employment at a later date.

If appropriate, after the interview, the candidate should be asked for details to enable the People Team to carry out a DBS disclosure application.

The second part of the Interview consists of skill-based questions specific to the role and separately tasks such as a literacy and numeracy test or written question on curriculum or finances may be set depending on the role.

Finally, a confirmation of outcome form is completed with feedback from the interview. This provides confirmation of whether the candidate was successful or not, and if so, the starting salary to be offered.

Stage 5 Offers of Appointment / Contract

The Recruiting Manager should inform the People Team as soon as a decision is reached on the candidate and should send over the interview documentation. The People Team will then make a conditional offer of employment to the suitable candidate following discussions with the recruiting manager and receipt of the interview summary sheet. The offer of appointment is made conditional on the satisfactory completion of the following pre-appointment checks and should be tailored specifically according to which checks are outstanding:

- References – Should be obtained and scrutinised as quickly as possible if not obtained before the interview.
- Identity -Three forms of ID should be verified in person if not verified at interview, and should include photographic ID, proof of date of birth and proof of address as required for a DBS disclosure application. Any queries on this should be directed to the HR department.
- Qualifications -Any required qualifications should be verified by original certificates if not verified at interview.
- Permission to work in the UK – Proof of permission to work in the UK should be sought. Any queries on acceptable proof of permission to work in the UK should be directed to the HR department.
- DBS Disclosure – A satisfactory Enhanced DBS disclosure should be received for all those working directly with children. It is the policy that TCES will only employ a permanent employee once a TCES DBS has been received, or if the candidate is on the update service and a TCES DBS has been applied for.

- Children's barred list. A check will be carried out by the HR department to ensure the candidate is not prohibited from taking up the post. This will be printed and filed. The Children's Barred list will be checked as part of an Enhanced DBS disclosure.
- Prohibition from Teaching - For candidates applying for a teaching post, a check through the TRA for teachers or others who have been prohibited from teaching is carried out.
- Prohibition from work in Education - All candidates are checked to ensure they are not prohibited from working in education by carrying out a check of the Gov.uk website.
- S.128 Directive - All staff appointed to work in a management role are checked to ensure there is not a S128 directive against them. This is done by carrying out a DBS with a barred list and by checking the TRA site as per the 'Prohibition from management of independent schools: checking for directions' guidance from the DfE.
- Health– The medical questionnaire - Application form appendix A, will be completed by any successful applicants and will be scrutinised to ensure the candidate is medically fit for the post.
- QTS– As an independent School, TCES do not have to employ only teachers with QTS or QTLS, however all qualifications of teachers should be checked, and those with QTS are checked on the TRA Secure Access database as a confirmation of these qualifications.
- Statutory induction - Evidence of this should be shown by teachers who obtained QTS after 7 May 1999 and is checked against the TRA Secure Access site.
- Therapists must be registered with the Health and Care Professions Council (HCPC), with their Surname and/or Registration Number checked against the HCPC online register.
- A suitable overseas check is carried out on those candidates that have lived overseas as deemed necessary by a risk assessment which must be carried out by the People Team.

Temporary Staff Recruitment Procedures

Stage 1 Choosing Candidates

1. Planning
The Head of National Online School should collaborate with the People Team to confirm that the role is in the budget and then to decide a timetable for the recruitment process of the role required. The job description, person specification and other documents to be sent to agencies should be reviewed and updated as necessary.

2. Vacancy Advertisement
The role is given to agencies on the approved agency list for the relevant area, provided with a timetable and relevant documentation and asked to source candidates.

3. CVs on receipt
All CVs received should be scrutinised with any anomalies or gaps in employment noted to explore if the candidate is considered for the short-list. *If the post is urgent then as much information as possible should be found out on the possible candidates from the agency.*

4. Shortlisting
Once all the applications have been scrutinised a short-list should be drawn up of the most suitable candidates

Stage 2 Pre-Interview & Interview

NB – For urgent placements the suitable candidate will need to be chosen from discussion with approved agencies. To be an approved agency the correct form must have been completed by the agency and the rates for staff, plus any possible buy-out fees must have been agreed under guidance of the People Team.

1. Interview arrangements

A panel of interviewers should be arranged with available times and dates agreed. The panel should consist of at least two people who have undertaken the Safer Recruitment training and have the authority to appoint and for more senior roles should consist of 3-4 people. The panel should meet before the interviews and agree the interview format, issues and questions, assessment criteria and standards.

2. Invitation to Interview

Once the available times have been set, each candidate's relevant agency should be contacted by the People Team to arrange a mutually suitable time for interview. The agency should be reminded that candidates must bring as a minimum, photographic ID with them.

3. Interview

At the start of the interview the identity and qualifications of the candidates should be verified by scrutiny of the appropriate original documents. Copies of the original documents should be taken and placed on file. The interview should explore the candidate's suitability for working with children as well as their suitability for the post.

Stage 3 Post Interview

4. Conditional offer of temporary employment

The Head of Service should inform the agency as soon as a decision is reached on the candidate. The Head of Service will contact the agency and ask them to complete the agency vetting form for the worker. This form asks the agency to confirm all the relevant vetting checks have been completed on the worker. All completed forms are sent to the HR Department. No temporary worker involved with children can start work until this form is complete and authorised by Central Services. This vetting covers all the same checks as expected on a permanent member of staff.

Upon arrival of the chosen candidate on their first day, their photographic should be checked. Each candidate should have an induction that covers Health and Safety, Child Protection, Behaviour Management, Confidentiality, and the Emergency Reporting Structure.

Part Four: Managing Allegations against Staff

Introduction

Our aim is to provide a safe environment which secures the wellbeing of students in receipt of a service from our organisation. We do, however, recognise that sometimes allegations of abuse are made. We recognise that allegations, when they occur, are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are individuals who deliberately seek to harm others.

For all staff, the most important consideration is to safeguard and promote the welfare of our students. Any allegations of abuse must be taken seriously. It is important to remember that the best interests of children and young people - and the need for the abuse to stop - come before the interests of TCES, the National Online School or a potential abuser.

We will always ensure that procedures outlined in Working Together to Safeguard Children 2018 and Chapter 7 of the London Child Protection Procedures are adhered to and will seek appropriate advice from the relevant LADO in the area that the individual who is working or volunteering with children is working / volunteering.

Abuse of Trust

We know that some people seek access to children in order to abuse, and that abused children very often do not disclose the abuse at the time. We also know that some allegations of abuse made against professionals are substantiated, and there continue to be a number of cases every year in which professionals in all sectors are convicted of criminal offences involving the abuse of children.

All staff need to know that inappropriate behaviour with or towards students is unacceptable. Staff are provided with clear guidance on keeping children safe as well as guidance on safer working practice to keep themselves safe as outlined in this policy and the staff code of conduct.

Procedure

All allegations or suspicions of physical, sexual, or emotional abuse or neglect by staff, including the use of restraint, other than permitted by law or guidance issued by Government and professional bodies and in line with TCES policy, will be considered under our safeguarding procedures initially and steps taken to ensure the welfare of the student concerned.

The person receiving the concern or allegation should not attempt to investigate any allegation or suspicion of abusive behaviour yourself but assure the individual reporting it to you that what they have said to you will be passed on to someone whose job it is to deal with it.

The person receiving the concern or allegation should:

- make a written record of the information (if applicable, in the individual's own words), including the time, date and place of incident(s), persons present and what was said.
- sign and date the written record
- if any personal views are expressed about the information given, these must be recorded separately and clearly identified as such, signed and dated.
- report the matter immediately to the Head of National Online School

- if the concern/allegation is against the Head of National Online School, report the matter to the Head of Safeguarding
- If the concern/allegation is against the Head of Safeguarding, report the matter to the CEO.
- If the concern/allegation is in relation to the CEO, this must be reported to the Head of Safeguarding who will liaise with the People Team and the Safeguarding Lead Governor to agree next steps.

Initial Action by the Head of National Online School

On being informed of the concern/allegation, the Head of National Online School should:

- obtain written details of the concern/allegation, signed, and dated by the person receiving (not the individual making the allegation) and being careful to differentiate between fact, supposition and feeling.
- countersign and date the written details.
- record any information about times, dates and location of incident(s) and names of any potential witnesses.
- record any discussions about the individuals concerned, decisions made, and the reasons for those decisions.
- seek advice from the Head of Safeguarding or LADO, prior to the commencement of any further investigation

The Head of National Online School should not interview the member of staff, student or any potential witnesses until such time as advised by the Head of Safeguarding as this could jeopardise further child/adult protection enquiries or criminal investigation/s.

Allegations received outside of normal office hours

The Head of Safeguarding should consider where there is an immediate risk involving children and if this is perceived to be the case, contact the Local Authority Emergency Duty Team or the local Police. Written confirmation of a referral should be sent to the MASH on the next working day.

Trivial Allegations

The Head of National Online School will need to use their professional judgment to identify at the outset an allegation which is trivial in nature. It will then be appropriate for it to be dealt with at that level.

It is important to record the reasons for this judgment and how the matter was dealt with, e.g., notifying the parent/carer. The individual making the allegation may also consider the incident significant enough to report the matter directly to the MASH and/or Police or to some other agency such as Childline and so a written record of the issue is important to evidence actions taken in response.

The Head of Safeguarding should be contacted if there is any doubt, and in all cases a written record must be made of the incident and copied to the Head of Safeguarding and the People Team within 1 working day.

Initial Consideration

Where allegations are not perceived to be trivial from the outset, the National Online School DSL and the Head of Safeguarding should conduct an initial consideration process of the information available in order to decide on the most appropriate course of action. If there is any doubt about action to be taken, advice can be sought from the LADO.

Where there are welfare concerns or concerns that an individual may be at risk of harm, a referral will need to be made to the relevant Local Authority Children's/Adult's Service in line with this policy.

The Headteacher and the Head of Safeguarding must keep a written record of any decisions made, the reasons for those decisions and any action(s) taken, both formal and informal.

Reasonable Force

Where the allegation relates to the use of reasonable force to restrain a child, a full report must be made, and a copy sent to Central Services within 1 working day. The Head of Safeguarding will review any relevant information and provide written agreement to the Head of National Online School at the earliest opportunity as part of these procedures.

Referral to the Designated Officer for the Local Authority (LADO)

Where the threshold to consult with the LADO is met, this will be undertaken by the Head of National Online School. The Merton LADO (which is the relevant LADO for allegations relating to the National Online School staff) can be contacted to request a consultation or to make a referral via email: lado@merton.gov.uk or by phone on: 0208 5453187 / 07814642728.

Allegations that require a LADO consultation include allegations where an individual working or volunteering with children has:
- behaved in a way that has harmed a child or may have harmed a child.
- possibly committed a criminal offence against or related to a child.
- behaved towards a child or children in a way that indicates that they pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Any staff who do not feel confident to raise their concerns within the National Online School or the TCES Group should initially consider speaking the Safeguarding Lead Governor, Kirstie Harvey prior to contacting the LADO directly on 0208 5453187 / 07814 642728.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

Harm / Risk of Harm Threshold

Where the matter is deemed to meet the harm/risk of harm threshold, the LADO will convene an ASV meeting in line with Chapter 7 of the London Child Protection Procedures. The Head of National Online School (alongside the Head of Safeguarding and a representative of the People Team) will attend this meeting and agree next steps alongside the LADO.

If the ASV meeting concludes that there should be an investigation by Police and/or Social Services Child Protection Team, roles, timescales. and dates for future meetings should be agreed and tasks allocated.

The Head of National Online School should canvas the views of the LADO, Police and Children's Services about whether:

- the accused member of staff needs to be suspended or alternatives to current work arrangements found (however the final decision will always rest with TCES 's Proprietor and SMT)
- there are any constraints or limitations on the information that can be provided to the member of staff about the concern/allegation.
- the response to the child/ren's parents/carers and to the child/ren.
- appropriate support for the child/ren and parents/carers.
- the response to the accused member of staff.
- appropriate support for the accused member of staff and colleagues.
- the identity of the contact person to keep the member of staff informed of the progress.

It will be the final decision of TCES' Senior Management Team (SMT) as to whether any internal disciplinary investigation will be held in abeyance pending the completion of Police and MASH investigations. TCES' SMT will work in partnership with the multi-disciplinary team in line with Chapter 7 of the London Child Protection Procedures, but the final decision will always rest with TCES.

Where the matter is deemed not to meet the threshold of harm/risk of harm, the matter will be for the National Online School / TCES Group to manage internally. The Head of Safeguarding alongside the Head of National Online School will agree how the matter will be investigated alongside the People Team. For more details on concerns not meeting the harms threshold, please see below guidance regarding 'low level concerns'.

Suspension

When an allegation against a member of staff is made, and deemed serious enough, the member of staff may be suspended following an immediate risk assessment completed with advice from Human Resources. This measure, if deemed necessary, will be undertaken without prejudice pending further enquiries during the initial consideration stages. During this time the member of staff will receive full pay and any company benefits they may be entitled to. During suspension any contact with students or communication with relevant individuals is prohibited and may lead to further disciplinary procedures. Contact with other employees must be arranged and authorised by the Head of Safeguarding

For further details on the disciplinary process please refer to the Disciplinary Proceedings section of this policy, or to the Disciplinary and Grievance policy.

Record Keeping

The Head of National Online School and the Head of Safeguarding keeps a separate written record of decisions made in relation to allegations against staff. These are stored confidentially and will include a comprehensive chronology of the allegation, how the matter was followed up and resolved and notes of any action taken, and decisions reached (and justification for these), both formal and informal. If an allegation or concern is not found to have been 'malicious', the People Team will retain the records of the case on the individual's confidential personnel file and provide a copy to

the individual. TCES Group will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated, or malicious. We will also not refer to any history of allegations where all such allegations have been proven to be false, unsubstantiated, or malicious.

Allegation Outcomes

The following are formal allegation outcomes along with their definitions that have had LADO oversight:

Substantiated
There is sufficient evidence to prove the allegation that a child has been harmed or there is a risk of harm.

Malicious
There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive. The police should be asked to consider what action may be appropriate in these circumstances.

False
There is sufficient evidence to disprove the allegation, however, there is no evidence to suggest that there was and deliberate intention to deceive.

Unsubstantiated
There is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

Unfounded
The additional definition of 'unfounded' can be used to reflect cases where there is no evidence or proper basis which supports the allegation being made. It might also indicate that the person making the allegation misinterpreted the incident or was mistaken about what they saw. Alternatively, they may not have been aware of all the circumstances.

Where an allegation is shown beyond doubt to be demonstrably false, e.g., where there are objective witnesses to say that an incident could not have occurred, or the person accused was not present at the time, the Head of National Online School, in consultation with the Head of Safeguarding and People Team Manager, must:

- inform the member of staff orally and in writing of the allegation and that there is no cause for further action to be taken under disciplinary or child protection procedures.
- consider whether counselling and/or informal professional advice to the member of staff is appropriate and how this might be provided.
- inform the parents/carers of the child/ren of the allegation and the outcome in writing.
- consider appropriate counselling and support for the child or children who made the allegation(s) and, where appropriate, their parents/carers

- consider the advisability or otherwise of the member of staff concerned having to work with that child again, and how that may be affected and supported.
- In particular consider what follow up action should be taken in regard to a person or child who has made an allegation that is shown to be false, especially if it is shown to have been made maliciously.
- where a person other than the alleged child victim has made the allegation, consider informing the parents/carers and child/ren and providing support as appropriate.

Disciplinary Procedures

TCES firmly believes that the fairest way to resolve any problems relating to conduct or performance is to have a well-structured disciplinary procedure. The procedure is designed to help and encourage all employees to achieve and maintain the Company's standards of conduct, attendance and performance and should be looked upon as a corrective process.

Employees have the following rights in relation to disciplinary action:

- to be informed of the allegations of misconduct or poor performance to be addressed at any disciplinary hearing.
- to be accompanied by a work colleague or by a trade union official.
- to appeal against any disciplinary action.

Employees will always be given as much information as possible regarding the allegations of misconduct, or any documentation detailing the shortfall in performance or capability that will form the basis of the disciplinary hearing. Employees will also be given fair and reasonable notice of the date and time of the hearing and whenever possible the disciplinary hearing will be held during normal working hours.

Any disciplinary action will only be taken after a full investigation of the facts, and if it is necessary to suspend employees for this period of time, they will receive their normal rate of pay. The Company reserves the right to vary the disciplinary procedure dependent on either the seriousness of the allegations of misconduct or capability to be addressed, or if employees only have a short amount of service. Short service employees or those still within the probationary period, may not be issued with any warnings before dismissal.

NB The Company reserves the right to deduct from pay the cost of any damage or loss to property or goods, which after a disciplinary hearing was found to have been caused by an employees' negligence or vandalism.

Inappropriate Conduct Towards Children

In the case of inappropriate conduct towards children, disciplinary action will consist of a minimum of a final written warning and may lead to dismissal for gross misconduct.

Final written warnings will be issued in situations where it is sufficiently serious to warrant only one warning but is not sufficiently serious to justify dismissal. Employees will be informed in the final written warning that any further misconduct or failure to meet the required standard will result in dismissal.

Dismissal will normally result if an employee still fails to achieve the standard of conduct or performance required by the Company, or for matters of gross misconduct. Employees will be given

every opportunity to offer an explanation for any failure to meet the required standards at a final disciplinary hearing. As with all previous stages of the disciplinary procedure employees will be offered the right of a witness and the right to appeal against the decision.

Dismissed employees will be provided, as soon as is reasonably practicable, with the reasons for dismissal, the date on which their employment will terminate and details of how they may appeal.

Gross misconduct

Gross misconduct will result in summary dismissal, and employees lose their right to notice or pay in lieu of notice. Below is a list of offences that are normally regarded as "gross misconduct". It is not exhaustive, but it describes the kind of offence that can result in summary dismissal:

- Deliberate failure to comply with the published rules of the Company, including those covering safeguarding, child protection, security, health and safety, equal opportunities, the Internet, etc.
- Deliberate falsification of records
- The committing of offences against current discrimination legislation whilst acting on behalf of the Company
- Fighting or assaulting another person
- Using threatening or offensive language towards children, customers, or other employees. Making yourself unfit to work by solvent abuse, drinking alcohol, taking of illegal substances, or failing to follow medical instructions on prescribed drugs
- Being in possession of illegal drugs and substances or alcohol whilst on Company premises
- Obscene behaviour
- Behaviour likely to bring the Company into disrepute
- Conviction on a criminal charge that is relevant to your employment with the Company
- The misuse including use for personal gain, of confidential information in the course of working for the Company

Disciplinary Appeal Procedure

At each stage of the disciplinary procedure, employees will be given the right of appeal. If an employee wishes to exercise their right of appeal, they should put their reasons in writing to the CEO within five working days of receiving written confirmation of the disciplinary decision taken against them. The employee will need to explain why they feel the decision is unfair, or inappropriate in relation to the matters addressed at the disciplinary hearing.

If the employee has any new information or evidence to support their appeal, they should give the details in full and include the names of any witnesses they may wish to call to support them in their appeal. This is in order that there will be sufficient time to investigate any additional information before the appeal hearing. Employees are entitled to be accompanied at the appeal hearing by a work colleague or by a trade union official.

Although the purpose of the appeal is to review any disciplinary penalty imposed, it cannot increase the disciplinary penalty. The decision of the person dealing with the appeal is final.

Details of the full disciplinary procedure can be found in the TCES Disciplinary and grievance policy.

Referral to the Disclosure and Barring Service (DBS)

Regulated activity providers and personnel suppliers are required by law to refer a person to the DBS where they have:

- harmed a child or vulnerable adult (engaged in relevant conduct)
- pose a risk of harm to vulnerable s including children (satisfied the harm test)
- received a caution or conviction for a relevant offence

Referrals should not be made whilst a member of staff is suspended without prejudice pending an investigation as there would be no evidence at this point to support the thought that a person has engaged in relevant conduct or that the *harm test* is satisfied.

- Any referral must be made by the Head of Safeguarding by completing the DBS referral form in consultation with the DBS referral Guidance.
- The DBS will acknowledge the referral within three working days of receipt.
- The DBS will commence the decision-making process and may request additional information or documents.
- Following DBS consideration, if the DBS is 'minded to bar', the individual will be written to and provided with all the evidence, they will then be given 8 weeks to make representations to the DBS on why they should not be barred. Current employers and bodies or individuals with a registered interest in the individual concerned will be notified that the DBS is 'minded to bar'.
- Following representation, the individual, and any parties with a registered interest in the individual will be notified of the DBS's decision. If the individual is barred it is an offence for that individual to work in regulated activity which they are barred from, or for an employer to allow them to work in regulated activity which they are barred from.

Learning Lessons

At the conclusion of any case in which an allegation is substantiated, the Head of National Online School should review the circumstances of the case with the Head of Safeguarding, the People Team, and consultants and/or ASV meeting attendees to determine whether any improvements can be made to the company's, or the National Online School's practice or procedures to help prevent similar occurrences in the future.

Part Five: 'Low Level Concerns'

Introduction

This procedure enables all staff to share any concerns, not matter how small, about their own or another member of staff's behaviour with the Head of National Online School (or Head of Safeguarding in their absence) with a view to ensuring that students are safeguarded, and their welfare promoted.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is important. If implemented correctly, this should:

- encourage an open and transparent culture
- enable the identification of inappropriate, problematic, or concerning behaviour early
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the National Online School are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

Who does this policy apply to?

All staff who work with the National Online School either in an employee, volunteer or contracting capacity.

Purpose

The purpose of this policy is to create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour which are set out in the code of conduct are constantly lived, monitored, and reinforced by staff.

To achieve this purpose the National Online School will:

- Ensure that staff are clear about, and confident to distinguish, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour- in themselves and others, and the delineation of professional boundaries and reporting lines.
- Empower staff to share low- level concerns with the Head of National Online School and to help all staff to interpret the sharing of such concerns as a neutral act.
- Address unprofessional behaviour and help the individual to correct such behaviour at an early stage.
- Identify concerning, problematic, or inappropriate behaviour- including any patterns- that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO.
- Provide for responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Help identify any weakness in the National Online School's safeguarding processes.

Concerns should be reported as soon as reasonably practical but within 24 hours.

Definitions

Appropriate conduct is the behaviour which is entirely consistent with the TCES staff code of conduct, policy and procedures and the law.

The distinction between an allegation and a low-level concern.

Allegation

The term 'allegation' means that it is alleged that a person who works with children has:
- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low-level concern

A low- level concern is any concerns about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to LADO. These are also known as minor concerns. A low-level concern is any concern- no matter how small, and even if no more than a 'nagging doubt'- that an adult may have acted in a manner which:

- Is not consistent with TCES staff code of conduct, policy, and procedures (including conduct outside of work); and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to LADO.

Staff members should feel encouraged to self-report concerns to foster a culture of transparency. Staff, when reporting concerns, do not need to be able to determine in each case whether it is a low-level concern or a concern that meets the threshold of an allegation. The determination should be made by the Head of National Online School in conjunction with the TCES Head of Safeguarding.

Responding to a Concern

The Head of National Online School will review the information and consult with the Head of Safeguarding to determine whether:

- the behaviour is entirely consistent with TCES staff code of conduct, policy and procedures and the law.
- constitutes a low-level concern.
- a referral to LADO is required.
- when considered with any other low- level concern that have previously been raised about the same individual, should be re classified as an allegation and referred to the LADO.

In cases where the low-level concern is about the Head of National Online School, the staff member should approach the Head of Safeguarding directly.

If it is decided that the low-level concern amounts to behaviour which is entirely consistent with the TCES staff code of conduct, policy and procedures and the law, it is important the Head of National Online School informs the individual in question what was shared about their behaviour and give them the opportunity to respond. The Head of National Online School should also speak to the person who shared the low-level concern to provide them with feedback about how and why the behaviour is consistent with TCES staff code of conduct, policy and procedures and the law. This type of situation may indicate the code of conduct is not clear, the training has not been clear, or the Low-level concern policy is not clear enough. If the same or similar low-level concern is subsequently shared by the same individual, and the behaviour is consistent with the TCES staff code of conduct, policy and procedures and the law, then an issue may need to be addressed about how the subject of the concern's behaviour is being perceived, if not about the behaviour itself and or the implementation of low-level concern policy. In these instances, the Head of National Online School should discuss this with the Head of Safeguarding so appropriate policies can be reviewed.

Low-Level Concerns Procedure

Once the Head of National Online School has determined the matter to be a low-level concern, they will speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other external agencies, where they have been contacted)
Make appropriate records of:

- All internal conversations, including the person who initially shared the low-level concern, the adult about whom has been shared, and any relevant witnesses.
- All external conversations (LADO/ external agencies)
- Their determination, the rationale for their decision and;
- any action taken.

It should be responded to in a sensitive and proportionate way. Maintaining confidence that such concerns when raised will be handled promptly and effectively whilst on the other hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand, protecting staff from any false misunderstandings or allegations. Any investigation of low-level concerns should be done discreetly and, on a need, to know basis. Typically, this will be the Head of National Online School, the Head of Safeguarding, the individual themselves and the People Team, although this will be reviewed on a case by case basis.

Most low-level concerns are likely to be minor concerns, and some will not give rise to any ongoing concern and accordingly not require any further action. Others will most appropriately be dealt with by means of management guidance and/ or training.

Any conversation should include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what if any support they might need in order to achieve and maintain that, and being clear on the consequence if it fails to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment, which is agreed with the individual and regularly reviewed with them, may also be appropriate.

Some low-level concerns may raise issues of misconduct or poor performance. The Head of National Online School should consider whether this is the case taking into account advice from the Head of Safeguarding and the People Team. It is important that there is close liaison and appropriate

information sharing between the Head of National Online School, Head of Safeguarding and the People Team so a holistic view of the individual can be taken.

Where a low-level concern does not raise misconduct or poor performance issues, it will not be subject to a formal process however it may still need to be discussed with the People Team.

When considered with any other low-level concerns that have been shared about the same individual and the issue should be re classified as an allegation, due to the harm/risk of harm threshold being perceived to require consideration then the allegation should be dealt with in accordance with the managing allegations policy.

Record Keeping

The Head of National Online School keeps a separate written record of decisions made in relation to allegations against staff which is accessible by the Head of Safeguarding. These are stored confidentially and will include a comprehensive chronology of concerns, how the matter was followed up and resolved and notes of any action taken, and decisions reached (and justification for these), both formal and informal. Records will be reviewed to ensure they have been dealt with promptly and appropriately. Reviews should consider any potential patterns of concerning, problematic or inappropriate behaviour. These reviews will be recorded as evidence they have happened.

References

Low-level concerns will not be included in references. References will only include substantiated (LADO) safeguarding allegations.

Appendix 1 Key Contacts

TCES Head of Safeguarding:
Tashanna Egbochue
Tel: 020 8543 7878
Tashanna.Egbochue@tces.org.uk

National Online School Designated Safeguarding Lead
Kirsten Roy
Tel: 02085437878
Kirsten.Roy@tces.org.uk

National Online School Deputy Designated Safeguarding Lead
Matthew Cooley
Tel: 02085437878 / 07736 275108
Matthew.Cooley@tces.org.uk

Merton MASH
020 8545 4226 or 020 8545 4227 (Out of hours: 020 8770 5000).

CHILDLINE: 0800 11 11

Other avenues of support:

- Reporting online abuse, from the National Crime Agency (NCA) Child Exploitation and Online Protection (CEOP) command
- Reporting harmful online content to the UK Safer Internet Centre
- Safeguarding from radicalisation, building resilience to extremism, and promoting shared values at Educate Against Hate
- Dealing with harmful online challenges and online hoaxes
- Handling the sharing of nudes and semi-nudes

Appendix 2 Safeguarding Policy and Procedures Flowchart

Procedure to follow when you have reason to suspect that a child or young person is suffering, or likely to suffer, some form of significant harm, or when an allegation of abuse has been made.

If at any time a pupil gives you information about being harmed, or the prospect of being harmed, you must tell them that the information he or she has given to you will have to be shared with more senior members of staff and **cannot be kept confidential**. They are likely to need your support with this.

Immediately make a note of what the pupil has said (using their own words). If possible, this should be with another suitable adult present, but not the person against whom an allegation has been made. Listen carefully and do not ask leading or probing questions. Allow the pupil to clearly explain what has happened.

You must inform the National Online School Designated Safeguarding Lead or Deputy(s) or the Head of Safeguarding in their absence immediately and seek their guidance. You must make direct contact with one of the above options – leaving messages is not acceptable.

Following discussion with the Head of Safeguarding, and if agreed, the DSL must contact the appropriate Children's Services / MASH team, and direct the reporting staff member to record the concern on MyConcern before the end of the school day.

For allegations regarding external person in position of trust: (non-TCES) contact the LADO department in the borough where the individual is working / volunteering following agreement from the Head of Safeguarding.

Any allegation of child abuse against any member of TCES staff, including an allegation against yourself, must be treated with the utmost seriousness and passed immediately to the Head of National Online School. This should not be shared with the DSL. In the absence of the Head teacher, the matter should be reported to the Head of Safeguarding.

The Head of National Online School will inform the Head of Safeguarding as a matter of urgency. The Head of National Online School will manage the process alongside the Head of Safeguarding and The People Team and:
- Agree with MASH/LADO/Police what information can/cannot be shared with parents/carers.
- Contact the allocated Social Worker/Local Authority SEN Officer (where appropriate).

If the concern/allegation is against the Head of National Online School, report the matter to the Head of Safeguarding and CEO.

If the concern/allegation is against the CEO, this must be reported to the Head of Safeguarding and the Director of People, who will consult with the LADO and Lead Safeguarding Governor on how to proceed.

The DSL must provide the following notifications within the timescales given below:
- A written report to the relevant Local Authority and Head of Safeguarding at the earliest opportunity on the day of the concern/allegation.
- A chronology of actions, including meetings, discussions, referrals and decision rationale must be added to MyConcern within 1 working day of the concern being raised.
- It is a statutory duty to inform the Secretary of State and Disclosure and Barring Service (DBS) within one month of the person leaving the school if a person ceases to work for the school and there are grounds for believing s/he may be unsuitable to work with children or may have committed serious misconduct.

Remember: If at any time you have concerns about a pupil, and especially if you suspect that they are suffering, or likely to suffer, some form of significant harm, you must tell the DSL immediately and record your concerns clearly and in writing. Not to do so would be considered a disciplinary offence.

Appendix 3 Guidelines on Safe Working Practice

The following guidelines are provided as examples of both good and bad practice that occur. Staff are encouraged to read the guidelines and to discuss with senior staff, colleagues, students, and others as a means of raising awareness in safeguarding matters and encouraging staff and child involvement in the development and understanding of safe ways of working. You may wish to develop these guidelines together and add examples of your own, to be shared with others as this is clearly not an exhaustive list.

Further guidance is available within the staff code of conduct which is written in line with the Guidance for Safer Working Practice as issued by the Safer Recruitment Consortium.

Examples of Good Practice
All staff are expected to adhere to the following principles and actions:
- Treat all students equally and with respect and dignity.
- Recognise the developmental needs and capacity of each student.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Always put the welfare of the student first.
- Promote fairness, confront, and challenge bullying behaviours.
- Be acutely aware of the power that a staff member develops with students and avoid any intimacy (sexual or otherwise).
- Avoid unnecessary physical contact with students (face to face tuition). Where any form of physical contact or support is required, it should be provided openly and with the consent of the student.
- If you accidentally hurt a student, he/she seems distressed in any manner, appears to be sexually aroused by your actions and/or if the student misunderstands or misinterprets something you have done, report any such incidents as soon as possible to another colleague and the DSL and keep a written record. Parents/carers should also be informed of the incident.
- Be an excellent role model. This includes not smoking/vaping in the company of student people and reasonable standards of behaviour in respect of discussing alcohol or recreational drugs use.

Examples of Poor Practice
The following are regarded as examples of poor practice and are to be avoided:
- unnecessarily spending time alone with a student away from others.
- taking a student alone in a car on journeys, however short.
- taking a student to a staff member's home.
- Giving a student a staff member's home phone number.
- allowing or engaging in inappropriate touching of any form.
- allowing students to use inappropriate language unchallenged.
- making sexually suggestive comments to a student, even in fun.
- reducing a student to tears as a form of control.
- allowing allegations made by a student to go unchallenged, unrecorded, or not acted upon.
- using personal phones to make calls to parents/carers/ students.
- Taking photos or other media of student on personal equipment including camera phones
- where it is impractical/impossible to avoid certain situations, e.g., transporting a student in your car, this should be done with the full understanding and consent of the parent/carer and the student involved. The reasons for it should be documented and made available to the relevant people concerned. The DSL should be notified.

It is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of staff or others to make judgements about whether or not abuse is taking place. It is, however, their responsibility to identify poor practice and possible abuse, to report concerns and act if they have concerns about the welfare of a student.

Appendix 4 Recruitment Procedure – Permission to work in the UK

Following the UK's departure from the EU, there have been changes to individual's right to work. Checks completed on an individual's right to work should be completed using the government's right to work online tool: https://www.gov.uk/legal-right-work-uk

Since 1 July 2021, EEA citizens and their family members are required to have immigration status in the UK. They can no longer rely on an EEA passport or national identity card, which only confirms their nationality, to prove their right to work. They are required to provide evidence of lawful immigration status in the UK, in the same way as other foreign nationals. See Annex B of the guidance for further information: https://www.gov.uk/government/publications/right-to-work-checks-employers-guide/an-employers-guide-to-right-to-work-checks-6-april-2022-accessible-version#annex-b-eea-citizens

Candidates need to be able to show a valid original of one of the following in order to work in the UK. This should be copied and filed:

List A – acceptable documents to establish entitlement to Work:

1. A passport (current or expired) showing the holder is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK.
2. A passport or passport card (in either case, whether current or expired) showing that the holder is an Irish citizen.
3. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man, which has been verified as valid by the Home Office Employer Checking Service, showing that the holder has been granted unlimited leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules, Appendix EU to the Immigration (Bailiwick of Guernsey) Rules 2008 or Appendix EU to the Isle of Man Immigration Rules.
4. A current passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
5. A current Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
6. A birth or adoption certificate issued in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
7. A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
8. A certificate of registration or naturalisation as a British citizen, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.
9. A passport or passport card (in either case, whether current or expired) showing that the holder is an Irish citizen.
10. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man, which has been verified as valid by the Home Office Employer Checking Service, showing that the holder has been granted unlimited leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules, Appendix EU to the Immigration (Bailiwick of Guernsey) Rules 2008 or Appendix EU to the Isle of Man Immigration Rules.

List B – acceptable temporary right to work documentation (until the expiry date of permission to enter or permission to stay):

11. A current passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to do the type of work in question.

12. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man, which has been verified as valid by the Home Office Employer Checking Service, showing that the holder has been granted limited leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules, Appendix EU to the Immigration (Bailiwick of Guernsey) Rules 2008 or Appendix EU to the Isle of Man Immigration Rules

13. A current Immigration Status Document containing a photograph issued by the Home Office to the holder with a valid endorsement indicating that the named person may stay in the UK and is allowed to do the type of work in question, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.

List C – acceptable temporary right to work documentation (for six months):

14. A document issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules (known as the EU Settlement Scheme) on or before 30 June 2021 together with a Positive Verification Notice from the Home Office Employer Checking Service.

15. A Certificate of Application (digital or non-digital) issued by the Home Office showing that the holder has made an application for leave to enter or remain under Appendix EU to the immigration rules (known as the EU Settlement Scheme), on or after 1 July 2021, together with a Positive Verification Notice from the Home Office Employer Checking Service.

16. A document issued by the Bailiwick of Jersey, the Bailiwick of Guernsey or the Isle of Man showing that the holder has made an application for leave to enter or remain under Appendix EU(J) to the Jersey Immigration Rules or Appendix EU to the Immigration Rules (Bailiwick of Guernsey) Rules 2008, or Appendix EU to the Isle of Man Immigration Rules together with a Positive Verification Notice from the Home Office Employer Checking Service.

17. An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, together with a Positive Verification Notice from the Home Office Employer Checking Service.

18. A Positive Verification Notice issued by the Home Office Employer Checking Service to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question.

Appendix 5 Forms used during the Recruitment Process

The following documents are the forms used by TCES as part of the recruitment process.

1. Recruitment Request form
   This form must be completed in full by the recruiting manager, signed off by the Head Teacher and sent to the HR department. The HR department will check the form and obtain authorisation for the role prior to advertising or advise the Head Teacher why the role has been denied.

2. Application form
   The application form is used to ensure we obtain all the information required from all applicants and to make it easier to compare the applicant against the selection criteria as well as to start the safeguarding process by asking each applicant to sign a declaration stating that they are not on List 99, disqualified from work with children, or subject to sanctions imposed by a regulatory body, e.g. the Teaching Regulations Agency and either has no convictions, cautions or bind-overs, or has attached details of their record in a sealed envelope marked confidential.

3. Agency supply staff agreement
   This form should be sent to all agencies when agreeing terms. This form must be signed by the agency and returned before the agency can become an approved agency. In addition to this form, in order for an agency to become an approved agency rates for temporary staff, temp to perm staff and buy out rates must have been agreed and signed off by the Proprietor or Teaching Talent Branch Manager. This is to ensure the agencies have robust safe recruitment procedures in place for education staff.

4. Confirmation of vetting checks for supply staff
   Before a new temporary member of staff starts with TCES, this form must have been completed by the agency and authorised by the HR Department. This form is used as written confirmation that the agency has carried out sufficient checks on the temporary worker and as such must be kept on file at both Central Services, and by Teaching Talent.

5. Pre-employment checklist
   This form is used as a checklist that all the relevant safeguarding checks have been carried out on potential new members of staff, and each step must be completed as the check is carried out. In order for the potential new staff to start work, all the steps must be complete, and the form must be signed off by the HR department and for Senior Staff a member of the SMT.

TCΣS THE COMPLETE EDUCATION SOLUTION
HOME LEARNING

RECRUITMENT REQUEST FORM

This form must be completed and authorised prior to any recruitment taking place. Failure to do so may result in disciplinary action being taken against the recruiter. Please complete all **bold** sections.

Requestor:		**Date sent:**		**Date Received**:	

Is this role in the budget:	YES / NO (Please delete as appropriate)	*If no a business need case must be written and attached to this request*

Job Title:			**Location:**		
Type of Role: (Please circle)	Permanent	Supply	Temp to perm	Temp only	**Duration required:**
Type of role: (Please circle)	New	Replacement	**Name of person currently in role if applicable**:		
Justification – reason for vacancy			**Name of Child if Outreach, or if school based**		
Required Start Date			**Working hours**		
Special Instructions relating to role					
Does the role require a mobile phone, PC, username etc, please specify					

Recruitment request from Head Teacher/ Head of National Online School / SMT

Signature _____ Date _____

Recruitment approved by Finance:

Signature _____ Date _____

Communicated to HR   YES/NO

Salary /rate of pay agreed:	

Name _____ Position _____

Signature _____ Date _____

Agencies advised & Date	
Role Filled – Date and Agency		*Vetting Checks received by HR*	

TCES National Online School Tutor Application Form

TCES National Online School prioritises ensuring that our tutors are suitably matched to students whose needs they are best placed to meet. As such, we ask that you complete this form to assess the compatibility of your skills, knowledge and experience to our students' learning needs and personalities.

Please send your application to **recruitment@tces.org.uk** or submit it to the relevant section on our website.

After your application has been reviewed, you may be invited for interview. Rigorous safeguarding and vetting procedures will then be carried out before you are invited to join our team.

Personal details		
Title:	Last Name:	First Name:
Previous Surnames:	Please confirm the dates of previous surnames used:	
Address(es) within the last five years:	Month/Year From:	Month/Year To:

Home Telephone No:		**Daytime Telephone No:**	
Mobile Telephone No:		**Email address:**	

Areas you would consider working (direct tuition):	Days you are available to work:	Times you are available to work:
☐ Central London ☐ North-East London ☐ North-London ☐ North-West London ☐ South-East London ☐ South-London ☐ South-West London ☐ West London ☐ Other (please specify): _____	☐ Monday ☐ Tuesday ☐ Wednesday ☐ Thursday ☐ Friday	☐ Morning ☐ Afternoon ☐ Evening

Do you hold Qualified Teacher Status/Qualified Teacher Learning and Skills? Provide any further information (such as DfES number) in the box attached. Please know that holding QTS/QTLS is not a requirement for an assignment.		
☐QTS/QTLS obtained within the UK, as awarded by the Department for Education	☐QTS/QTLS obtained outside the UK. Please provide more detail in the box below	☐I do not hold QTS/QTLS

This post is not exempt from the Rehabilitation of Offenders Act 1974. We only ask applicants to disclose convictions which are not yet spent under the Rehabilitation of Offenders Act 1974. If you are not sure whether your convictions are spent, please contact Nacro for further advice.

Do you have any unspent convictions?　　　Yes　☐　　　　　　　　No　☐

If you have answered yes, you now have **two** options on how to disclose your criminal record.

Option 1: Please provide details of your criminal record in the space below.

Option 2: You can disclose your record under a separate cover provided that you mark a cross on the line below and attach the details in an envelope stapled to this form. The envelope should be marked **CONFIDENTIAL** and state your name and the details of the post.

I have attached details of my conviction separately_____ (Please mark with an X if appropriate.)

Staff applying to work for TCES National Online School are expected to have a range of skills, some of which they may not have previously applied in a work setting. This section will gather information about the skills, knowledge or experience you may use whilst working with TCES National Online School and will help us get to know you better. Please complete the below questionnaire as thoroughly as possible.

Could you please tell us about yourself and why you are interested in this role?

Which skills or knowledge do you have that would be useful for this role?

What qualifications/certificates do you hold?

School, College or University	Course/Subject	Dates	Qualifications & grades obtained	

Employment History

From (mm/yy)	To (mm/yy)	Full-time or Part-time	Employer	Address	Job Title	Reasons for leaving

Which levels of education do you feel confident to teach? Please select all that apply and give more detail on this in the box below.

☐Early Years Foundation Stage	☐Primary years
☐KS1	☐KS2
☐KS3	☐KS4
☐KS5	☐Further education

Do you speak any other languages, and would you be willing to incorporate these into lessons? Please specify in the box below.

☐ Yes Languages spoken: _____ _____	☐No

Please consider any experience or qualifications you have involving students with the following conditions. Select all that apply and provide details of relevant experience or qualifications in the box below.

☐Anxiety	☐Attention Deficit Disorder (ADD)	☐Attention Deficit Hyperactivity Disorder (ADHD)
☐Autistic Spectrum Condition (ASC)	☐Depression	☐Hearing Impairment (HI)
☐Moderate Learning Difficulty (MLD)	☐Multi-Sensory Impairment (MSI)	☐Physical Disability (PD)
☐Profound and Multiple Learning Difficulty (PMLD)	☐Severe Learning	☐Specific Learning Difficulty (SpLD)

	Difficulty (SLD)	
☐Speech Language Communication Needs (SCLN)	☐Visual Impairment (VI)	☐Other known learning condition(s)

Please quantify the amount and type of experience and describe relevant and appropriate qualifications to particular conditions.

Please outline any relevant experience working with the following types of student. Select all that apply and provide details of relevant experience or qualifications in the box below.

☐Externalising student with behavioural issues	☐Complex neurodevelopmental needs
☐Child at high risk of sexual exploitation	☐Signs of sexually harmful behaviour
☐Eating disorder or showing risks of self-harm	☐Internalising student / severe social phobia
☐Complex offending/substance misuse issues	☐High-dependency child

Please provide additional information regarding the classifications of student dealt with.

REFEREES

The company requires a minimum of two relevant, satisfactory references prior to employment. **Please complete the section below in full**

Please give details of your last two employers or of your employers over **the last 5 years**. If your two most recent employers don't cover at least two years of work history, please provide additional referees to make up this time period.

College leavers should provide the name of a lecturer/tutor/professor, where appropriate. If this is not possible, please give the names of professional persons best able to write a reference in support of your application. *Friends/relatives cannot act as referees.*

NB: If you are applying for a position where you will be working directly with young people, we generally require two references relating to your previous work in this area.

References may be taken up before interview. If you are not willing for your current employer to be contacted at this stage, please write NO in the space provided here:

Please note that we reserve the right to take up references from any previous employer.

Applicant Name:		
Referee 1	**Referee 2**	**Referee 3 (optional)**
Company Name:	**Company Name:**	**Company Name:**
Referee's Name:	**Referee's Name:**	**Referee's Name:**
Position in Company:	**Position in Company:**	**Position in Company:**
Address: **Post code:**	**Address:** **Post code:**	**Address:** **Post code:**
Telephone no:	**Telephone no:**	**Telephone no:**
Email:	**Email:**	**Email:**
Date employment started:	**Date employment started:**	**Date employment started:**
Date employment finished:	**Date employment finished:**	**Date employment finished:**
Position held by you:	**Position held by you:**	**Position held by you:**
Did you have direct contact with young people in this position? YES/NO **(Please circle / delete as appropriate)**	**Did you have direct contact with young people in this position? YES/NO** **(Please circle / delete as appropriate)**	**Did you have direct contact with young people in this position? YES/NO** **(Please circle / delete as appropriate)**

DECLARATIONS

Rehabilitation of Offenders

This post is exempt from the Rehabilitation of Offenders Act 1974 and the successful applicant will be required to apply for an enhanced DBS certificate. As the post will involve regulated activity with children, it is a criminal offence to apply for this post if you are included on the children's barred list held by the DBS.

Amendments to the Exceptions Order 1975 (2013 & 2020) provide that certain spent convictions and cautions are 'protected'. These are not subject to disclosure to employers and cannot be taken into account. Guidance and criteria on the filtering of these cautions and convictions can be found on the Ministry of Justice website or see here.

Shortlisted candidates will be asked to provide details of all unspent convictions and those that would not be filtered, prior to the date of the interview. You may be asked for further information about your criminal history during the recruitment process. If your application is successful, this self-disclosure information will be checked against information from the Disclosure & Barring Service before your appointment is confirmed.

Do you have any convictions that are unspent under the rehabilitation of offender's act 1974? (Including cautions, reprimands and final warnings)	Y/N
If yes, give details:	

DBS Declaration

All staff in the TCES Group are DBS checked. If you are successful, you will be required to provide relevant evidence of the following details prior to your appointment. Applicants who have lived overseas will need to provide an overseas police record check for any countries you may have previously resided in.

Do you hold an Enhanced DBS check?				Y/N
Number		Date of issue		
Counter Signatory		Registered Body		
Are you currently on the DBS update service?				Y/N
Do you give us permission to apply for an Enhanced DBS if successful? (Copies of ID taken at interview will be used to process an Enhanced DBS application in the name of The TCES Group).				Y/N
Are you aware of any police enquires undertaken following allegations made against you, which may have a bearing on your suitability for this post?				Y/N
Can you confirm that I am not on the Children's Barred List, disqualified from teaching or working with children, nor under sanctions imposed by a regulatory body				Y/N

CONSENT

I consent to the information that I provide on this application form being checked against all relevant records and I am aware that any 'spent' convictions will be disclosed by the DBS. Should I have any convictions, I consent to The Complete Education Solution (TCES) passing on details of these convictions to any prospective Local Authority.

I am aware that providing false information is an offence and that doing so may lead to my application being rejected, summary dismissal if I have been selected for the post and possible referral to the police.

Privacy notice

We process personal data relating to those who apply for job vacancies with us or who send speculative job applications to us. We do this for employment purposes, to assist us in the selection of candidates for employment, and to assist in the running of the business. The personal data may include identifiers such as name, date of birth, personal characteristics such as gender, qualifications, and previous employment history.

We will not share any identifiable information about you with third parties without your consent unless the law allows or requires us to do so. The personal data provided during an application process will be retained for a period of at least six months or, if required by law, for as long as is required.

This privacy notice does not form part of an employment offer or contract between us. If we make an employment offer to you, we will provide further information about our handling of your personal information in an employment context separately.

If you would like to find out more about our data retention policy and how we use your personal data, you want to see a copy of the information about you that we hold or have any questions or issues regarding data protection, please email us with the Subject "Data Protection Request".

I declare that the information provided on this application form is true and correct. I understand that, should any information prove to be incorrect, this could lead to my application being rejected or, if selected for employment, disciplinary action.

Please also complete and return the Equal Opportunities Form, which we need for monitoring purposes.

Signature of Candidate: ………………………………………………………… **Date:** ……………………

NB: If you are returning this form by email, you will be asked to sign your application at the interview.

![TCES - The Complete Education Solution - Home Learning]

Section 7: TCES MONITORING INFORMATION

We will treat the information provided as strictly confidential and will only use it for monitoring purposes. The information you provide will be used to produce anonymous statistics to help us with equal opportunities.

Vacancy details

Position applied for

How did you find out about this vacancy?

TCES Website		Newspaper Advert		(Please state which paper)	
Word of mouth		Website Advert		(Please state which website)	

Sex   Are you

Age Range   Are you

Male		Female		18-24			25-35		35-45		45-60		60+	

Ethnic Origin   How would you describe yourself? (Categories are based on the 2001 census)

White		British		Irish			
		Other		Please give details			
Mixed		White and Black Caribbean		White and Black African		White and Asian	
		Other mixed		Please give details			
Asian or Asian British		Indian		Pakistani		Bangladeshi		Tamil	
		Other Asian		Please give details			
Black or Black British		Caribbean		African			
		Other Black background		Please give details			
Chinese or other ethnic		Chinese					
		Any other ethnic		Please give details			

Disability Have you had any of the following difficulties?

Diabetes	Mild		Moderate		Severe	
Dyslexia	Mild		Moderate		Severe	
Hearing Difficulties	One		Both			
Deafness	Mild		Moderate		Severe	
Difficulty with speech	Mild		Moderate		Severe	
Visual difficulties	One		Both			
Blindness	Mild		Moderate		Severe	
Limited use of arms or Legs	Yes		No			
Use a Wheelchair	Yes		No			

 Do you consider yourself to have a disability? (The disability Discrimination Act defines a disabled person as someone with 'a physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities').

Yes		No		Prefer not to say	

Religion   What is your religion? (Categories are based on the 2001 census)

None		Buddhist		Christian		Hindu		Muslim		Jewish		Sikh	
Other		Please give details											

Sexuality What is your sexuality? (Categories are based on the 2001 census)

Heterosexual		Gay or Lesbian		Bisexual		Prefer not to say	

Appendix A: MEDICAL HISTORY

The following information will be kept confidential:

Name_____

1a. Have you currently, or ever had any of the following medical conditions	**YES**	**NO**

Heart trouble		
Lung Disease		
Stomach / bowel trouble		
Jaundice / hepatitis		
Joint Problems		
Headaches / Migraines		
Diabetes		
Allergies		
Severe stress reaction		
Serious accident		
High blood pressure		
Asthma		
Hernia or rupture		
Kidney / bladder disorder		
Back /neck problems		
Fits / blackouts / epilepsy		
Depression / anxiety		
Hearing / sight problems		
Skin problems		
Surgical operations		
Mobility problems		
Are you registered as disabled		
Has your employment ever been terminated on the grounds of ill health?		

1b. Approximately how many days sickness absence did you have in the last 12 months_____
1c. If you have answered **'yes'** to any of the above questions, please give details. This is particularly important where you have a qualifying disability under the Disability Discrimination Act 1995, as it will enable us to identify what, if any 'reasonable adjustments' can be made.

(Continue on a separate sheet if necessary.)

2

What is your height?		What is your weight?	
What is your weekly consumption of alcohol?			
Do you smoke?			
Are you currently taking prescribed medication?			
Are you currently under the care of a doctor or other medical professional?			
Name and address of GP			

DECLARATION   (Please sign before returning)

I hereby declare that the information given is true and complete. Furthermore, I am not aware of any condition, medical or otherwise, which would limit or affect my employment or performance. I understand that if, at a later date it is discovered that I have knowingly withheld medical information, disciplinary action may be taken against me, which may include dismissal.

Signed……………………………………   Date: …………………………………………….
Please Print Name………………………………………………………………………………………………………

TC EDUCATION SERVICES
Agency Supply Staff Agreement
Agency name: _____Date _____

Statement of safe recruitment practice

"It is important that thorough checks are made on anybody who will be working in a school ... both to prevent unsuitable people from gaining access to children and young people and to maintain the integrity of the teaching profession and confidence that schools … are safe places for children and young people" DfES guidance *'Safeguarding Children and Safer Recruitment in Education'* DfES 2007

In accordance with the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (the Conduct Regulations), we confirm that:

We have made checks to ensure that any supply staff have the qualifications required for the post.

All appropriate checks have been undertaken in line with those a school would be required to carry out for its own permanent staff employees, including Children Barred checks and DBS enhanced disclosures.

In line with the above and with the further requirements placed on agencies where the position involves working with vulnerable persons, in this case children, we have in all cases obtained, and will provide copies of the work seeker's relevant qualifications or authorisations, and two independent references.

A DBS disclosure no. will be given and, where DBS disclosures contain information, a copy of the disclosure will be provided to the appropriate named person within TCES.

Where a DBS disclosure contain information a copy of the risk assessment carried out by the agency will be forwarded to the appropriate named person within TCES.

As the supply worker is to work with children, we have also taken all reasonable steps to confirm that the worker is not unsuitable for the work.
"While the Conduct Regulations do not spell out what "all reasonable steps" means, the School Staffing (England) (Amendment)(No2) Regulations 2006 and the Further Education (Providers of Education) (England) Regulations 2006 specify that a DBS Disclosure must be obtained, and a copy supplied for supply staff to the relevant [education setting] where the Disclosure includes information."

We have also made all reasonable enquiries to ensure that the interests of the supply worker and TCES as the hirer would not be harmed if the worker were to carry out the work.

The supply worker will bring a valid photographic form of personal ID when arriving for work for the first time at any TCES education site.

I confirm that I have the authority to sign for all London and Essex branches of the agency I work for

Signed…**…….………………………**Name:**…………………………………**Job Title:**……………………….…………………...**

It is understood by TCES that any agency which carries the DCSF Quality Mark for supply agencies has been inspected by the Recruitment and Employment Confederation and found to comply with good recruitment practices (and) is specifically signed up not only to performing all the required checks (which of course all agencies have to do), but also to good practice in recruitment and development of the staff they supply.

NB: When faxing confidential information, agencies are asked first to confirm by phone that a fax is being sent and, for security, to first fax a blank sheet of paper and confirm receipt by the named recipient, to ensure it has been sent to the correct fax number.

Confirmation of Vetting Checks
Private and Confidential

Send to:	From
FAO:	Date:
Phone Number:	Phone Number:
Fax Number:	Fax number:

As required under Safeguarding Children and Safer Recruitment in Education, could you please confirm the following checks have been carried out on INSERT NAME

Vetting Check Required	Date	Details
2 satisfactory references one being from the current or most recent employer, and one relating to the candidate's most recent work with children (if applicable) **State date each was obtained**		
Identity checks, state what was seen and when		
Check on qualifications required for the role – **state what was seen and when**		
Has a CRB enhanced disclosure been applied for – if yes give reference number		
CRB Enhanced disclosure seen / received – Disclosure no Issue Date Issuing Body		
If not from your agency have you seen a copy of the candidates CRB		
ON THE CRB IS THERE ANY INFORMATION UNDER THE HEADINGS: • CONVICTIONS, • CAUTIONS, • INFORMATION ON THE LIST HELD UNDER SECTION 142, • INFORMATION HELD ON THE ISA CHILDREN'S BARRED LIST OR • ISA VULNERABLE ADULT'S BARRED LIST *if so we require a copy of the disclosure to be forwarded to us before the individual can start work as per the safeguarding and safer recruitment in education legislation*		
If not from your agency was clear portability obtained		
Did the disclosure include any additional information: *if so we require a copy of the disclosure to be forwarded to us before the individual can start work*		
ISA Children's barred list – please state if this was clear and the date		
Overseas criminal record check (where applicable) Please provide details of the check and the date carried out		
Medical Fitness – please confirm the worker is fit to work in a school		
Professional status (ie confirmation of QTS status if applicable.) Please provide GTC number		
Complete induction and/or probationary period as required for the position.		

I confirm the above information is correct:

Signed_____ Name_____

Agency Name_____ Date_____

I confirm that the above-named agency worker is cleared to work for TC Education Services

Signed_____ Position_____ Date_____

(For)

Vetting Checklist – confirmation of checks / Contents

Employee name _____
Role and Location _____
Start Date _____

Check	Section location	Applied for	Complete and in file	Comments
Employee profile	1			
JD	2			
Application Form	3			
Personal Profile	3			
Medical Questionnaire	3			
Medical RA if applicable	4			
Children's Barred List	4			
DBS	4			
Prohibited from Education check	4			
Prohibited from Teaching check	4			
Disclosure by association check	4			
Overseas Police Check (if required or RA)	4			
Proof of entitlement to work in the UK	5			
Proof of DOB	5			
Proof of address	5			
Qualifications(Non-negotiable for Teachers)	6			
Reference 1	7			
Reference 2	7			
Telephone follow-up	7			
Supplementary Questions	8			
2 x Interview questions	8			
Tests (if in school and not a qualified teacher)	8			
Lesson Observation (If Teacher)	8			
Offer Letter	9			
Contract	9			
New starter information	10			
Probation information	11			
Changed to terms and conditions	12			
Absence information	13			
Supervisions / Observations	14			
Appraisals	15			
Training records and Certificates	16			
- Level 1&2 (3) Safeguarding				
- Prevent Training				
Signed Policies	17			
- Signed KCSE				
- CP Flowchart				
- Code of Conduct incl My responsibilities & Dos and Don'ts				
Induction Documentation	17			
Employee Relations	18			
Miscellaneous	19			
Leaver / Exit Information	20			

NB: Items in bold are non-negotiable and must be present, those in italics are depend on individual role and circumstances, and those in plain text are ongoing through the life of the employee
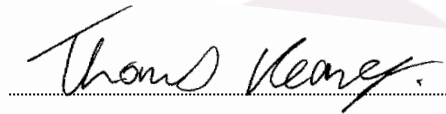
I confirm the above checks have been carried out with satisfactory results
Signed HR _____ Position _____ Date _____
Signed SMT (senior roles) _____ Position _____ Date _____

The Complete Education Solution
Policy Sign Off

This policy was agreed and implemented by Thomas Keaney on behalf of TCES:

Signed: _Thomas Keaney_ **CEO, TCES.**

Date of next formal review: **September 2024**