

# SAFEGUARDING AND CHILD PROTECTION POLICY & PROCEDURES

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## GLOSSARY OF TERMS

CAF	Common Assessment Framework; part of an inter-agency assessment co-ordinated by the LADO
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service (formerly CRB)
DfE	Department for Education (government)
DSL	Designated Safeguarding Lead; named person within the School with responsibility for co-ordinating and overseeing child safeguarding
EYFS	Statutory framework for the early years foundation stage
FGM	Female genital mutilation
ICT	Information and communication technology
ISI	Independent School Inspectorate (body that inspects the School)
ISSR	Independent Schools Standards Regulations
KCSIE	Keeping Children Safe in Education (government document)
LADO	Local Authority Designated Officer
LSCB	Local Safeguarding Children Board
TRA	Teaching Regulation Agency
PSHCE	Personal, Social, Health, Citizenship and Economic Education
QTS	Qualified Teacher Status
SCR	Single Central Register (record of personal details of those working at the school)
SEN	Special educational needs
SMT	Senior Management Team
RSE	Relationships and Sex Education
TAC	'Team around the child' strategy; a meeting that is part of a CAF (see above)

## INTRODUCTION

### Definition of safeguarding

Safeguarding is defined in law as, ‘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; and taking action to enable all children to have the best outcomes.’<sup>1</sup>

### Safeguarding at the School

The School is committed to safeguarding the children in its care and complying at all times with the statutory framework. In line with its responsibility for ensuring compliance with safeguarding law, the Governing Body reviews the Safeguarding and Child Protection policy annually, and in addition whenever new legislation or guidance makes earlier review necessary. This policy, produced by School’s SMT and approved by the Governors, applies to all staff and volunteers, and is available to parents via the School website or in hard copy, upon request. The policy applies to all staff and volunteers whenever or wherever they are working with boys of the School. Safeguarding ‘is everyone’s responsibility’.

### Statutory and non-statutory guidance framework

This policy has regard to the following statutory and non-statutory guidance:

- [Sharing nudes and semi-nudes](#) (UK Council for Internet Safety)
- [Relationships Education, RSE and Health Education](#) (effective September 2020)
- [Teaching online safety in school](#) (June 2019)
- [Statutory framework for the early years foundation stage](#) (April 2017)
- [Sexual violence and sexual harassment between children in schools & colleges](#) (May 2018)
- [Keeping Children Safe in Education](#) (September 2021) (KCSIE)
- KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006](#) (February 2015);
- KCSIE also refers to the non-statutory advice for practitioners, [What to do if you’re worried a child is being abused](#) (March 2015);
- [Working Together to Safeguard Children](#) (July 2018) (WT);
- WT refers to the non-statutory advice, [Information sharing](#) (July 2018);
- [The Prevent duty: Departmental advice for schools and childminders](#) (June 2015) (Prevent);
- [The use of social media for on-line radicalisation](#) (July 2015);
- [Education \(Independent Schools Standards\) Regulations \(England\)](#) (December 2014).

### Scope of this policy

This policy covers the following safeguarding and child protection duties:

- the School’s policy and procedures for dealing with concerns about a child, in accordance with locally agreed inter-agency procedures;
- the School’s arrangement for handling allegations of abuse against members of staff, volunteers and the Head;

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<sup>1</sup> Keeping Children Safe in Education, para 4.

- the School's code of conduct for staff;
- whistleblowing procedures;
- the School's safer recruitment procedures;
- the School's management of safeguarding and the Designated Safeguarding Lead (DSL);
- the training of the DSL, staff, relevant Governors, volunteers and the Head;
- arrangements for reviewing the School's policies and procedures annually;
- the School's arrangements to fulfil other safeguarding and welfare responsibilities.

## 1. CONCERNS ABOUT A CHILD

### The School's Local Safeguarding Child Board and LADO

Although within the district of Westminster City Council, the School comes under the Local Safeguarding Children Partnership (LSCP) for [Kensington and Chelsea and Westminster](#).

The Local Authority Designated Officer<sup>2</sup> (LADO), whose role it is to provide advice and guidance to the School and oversee individual child protection and safeguarding cases, is:

**Aqualma Daniel**

Local Authority Designated Officer

**Email** [adaniel@westminster.gov.uk](mailto:adaniel@westminster.gov.uk)

**Tel** 07870 481 712

Where a concern involves an adult working with children, or where there is a concern that a child may be being abused by a peer, the LADO should be informed. Where a concern involves another adult (e.g. family member or friend), a referral should be made to the Westminster Council Duty and Assessment Team, via:

The Access to Children's Services Team

020 7641 4000 (office hours)

020 7641 6000 (out of office hours)

[AccesstoChildrensServices@westminster.gov.uk](mailto:AccesstoChildrensServices@westminster.gov.uk) (case sensitive)

The School will share information and fully co-operate with local authorities and children's social care in line with statutory guidance [Working together to safeguard children](#), including to ensure early help is received where needs are identified.

### Governor for safeguarding

While responsibility for safeguarding is held by the Governors collectively, the Chair of Governors has designated Mike Pittendreigh as the Governor for Safeguarding and Child Protection.

**Email** [mikep@rcdow.org.uk](mailto:mikep@rcdow.org.uk)

**Tel** 079 7366 2548

The Governor Safeguarding and Child Protection ensures that Governor have oversight of policies and procedures by attending not only Governors' meetings, but additional termly meetings with the DSL where safeguarding policy, procedure and live matters are discussed. He/she also does a random sample of the SCR once a term.

### The School and the LSCB

The School's DSL has direct responsibility for making a referral to the LSCB. However, any employee or volunteer at the School may make a referral, if necessary. Indeed, every employee and volunteer has a responsibility to ensure timely action is taken to ensure proper safeguarding of children. This includes recognising, acting on and referring the early signs of abuse and neglect,

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<sup>2</sup> Although the term LADO has been replaced by 'designated officer, or team of officers', in Westminster the term is still used.

keeping clear records, listening to what the child says, reassessing concerns if situations do not improve, sharing information quickly and challenging inaction.

### **Understanding the signs and forms of abuse and taking action**

As part of their induction and annual safeguarding training, all employees of the School have read and understood [Part 1 of KCSIE, including Annex A](#) and are therefore apprised of the signs and forms of abuse and neglect (see NSPCC signs and symptoms, below). This enables them to identify any cases of abuse or neglect and refer their finding to the DSL, or, if necessary, to contact the LADO or, in an emergency, the police (by dialing 999).

All allegations which appear to meet the reporting criteria in KCSIE (described below) are to be reported straight away to the Designated Safeguarding Lead (DSL):

#### **The Designated Safeguarding Lead (DSL)**

Emily Auger, Deputy Head (Pastoral).

**Email** [eauger@choirschool.com](mailto:eauger@choirschool.com)      **Tel**    079 0848 1710

#### **The Deputy Designated Safeguarding Leads:**

Nicholas Morrell, Deputy Head (Academic) & Head of Boarding.

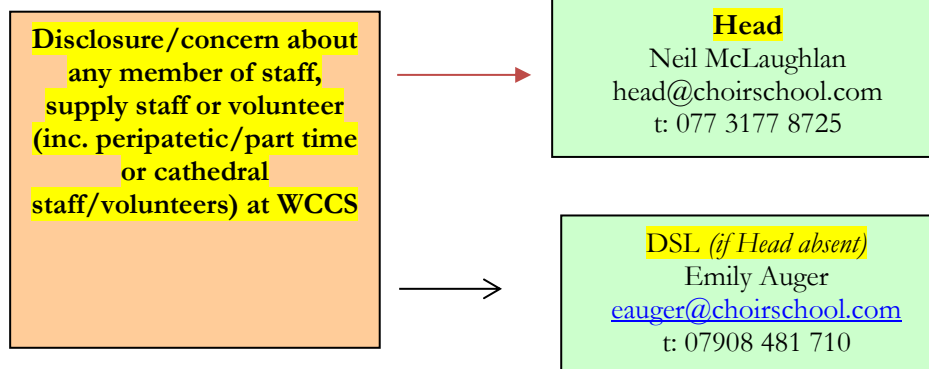
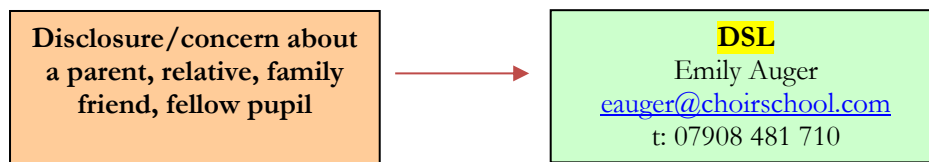
**Email** [nmorrell@choirschool.com](mailto:nmorrell@choirschool.com)      **Tel**    078 8629 4585

Juliet Rodger, Head of Pre-Prep.

**Email** [jrodger@choirschool.com](mailto:jrodger@choirschool.com)      **Tel**    079 0517 8327

If in doubt about whom to report a disclosure or concern, staff should refer to the following table:

If staff have any concerns about a child's welfare, they should act on them immediately  
 Whom to report a disclosure or concern



*If DSL is absent:*

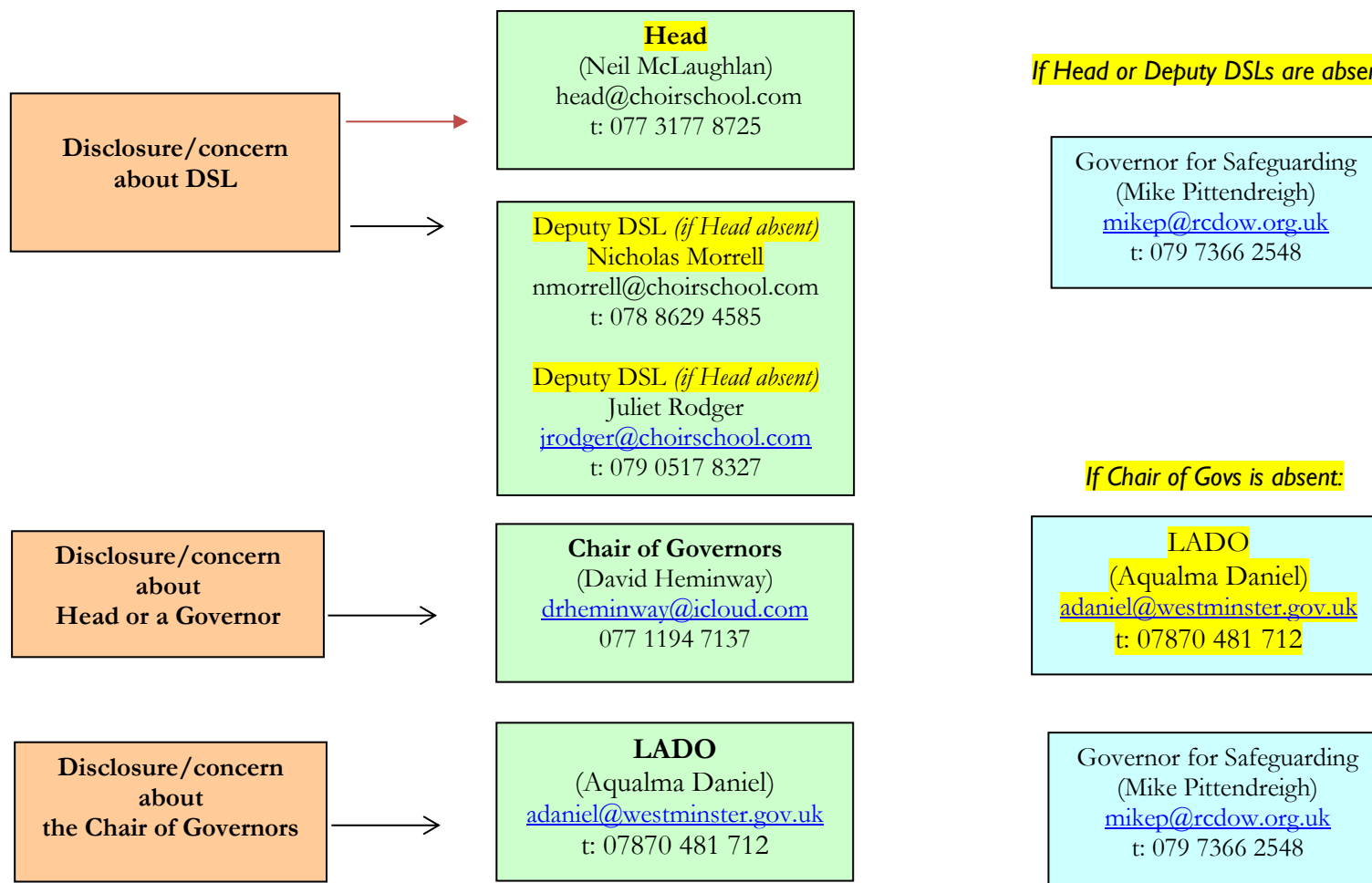
Deputy DSL  
 Nicholas Morrell  
[nmorrell@choirschool.com](mailto:nmorrell@choirschool.com)  
 t: 078 8629 4585

Deputy DSL  
 Juliet Rodger  
[jrodger@choirschool.com](mailto:jrodger@choirschool.com)  
 t: 079 0517 8327

**If Head or DSL absent:**

Governor for Safeguarding  
 (Mike Pittendreich)  
[mikep@rcdow.org.uk](mailto:mikep@rcdow.org.uk)  
 t: 079 7366 2548

If staff have any concerns about a child's welfare, they should act on them immediately

**Whom to report a disclosure or concern**




## Reporting criteria

Employees are also apprised of [\*What to do if you're worried a child is being abused\*](#). Staff should 'be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.'

The types of abuse and neglect are described in KCSIE as follows:

21. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

23. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

25. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal 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 from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Signs and symptoms of abuse and neglect**

The NSPCC have identified the following signs and symptoms of child abuse and neglect.<sup>3</sup>

Signs and symptoms of abuse (5-11 years):

- becomes secretive and reluctant to share information;
- reluctant to go home after school;
- unable to bring friends home or reluctant for professionals to visit the family home;
- poor school attendance and punctuality, or late being picked up;
- parents show little interest in child's performance and behaviour at school;
- parents are dismissive and non-responsive to professional concerns;
- is reluctant to get changed for sports etc.;
- wets or soils the bed.

Signs and symptoms of abuse (11-16 years):

- drinks alcohol regularly from an early age;
- is concerned for younger siblings without explaining why;
- becomes secretive and reluctant to share information;
- talks of running away;
- shows challenging/disruptive behaviour at school;
- is reluctant to get changed for sports etc.

### **Female genital mutilation (FGM)**

Despite only having male pupils, staff are obliged to be aware of the signs and symptoms of FGM. These include girls:

- from families less integrated into British society;
- born to a mother who has been subjected to FGM;
- who have a sister(s) who has undergone FGM;
- who are withdrawn from PSHE;

Girls from communities that practise FGM may be at particular risk:

- when newborn;
- during childhood (especially between the ages of 5-8) or adolescence;
- during school holidays when the family returns to its country of origin;
- when a female family elder is visiting from a country of origin;
- at marriage;
- during the first pregnancy.

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<sup>3</sup> This list is taken from the NSPCC [website](#).

Teachers should be alert to:

- conversations between girls about FGM (including in native languages);
- an attempt to disclose to a teacher impending FGM;
- uneasiness about the topic of FGM from parents or girls.

FGM may already have taken place if a girl:

- has difficulty walking, sitting or standing, or looks uncomfortable;
- spends longer in the bathroom or toilet;
- suffers frequent urinary, menstrual or stomach problems;
- is repeatedly absent or absent for a prolonged period followed by a change of behaviour;
- is unwilling to undergo a medical examination.

If any governor, member of staff or volunteer has a concern about FGM they should follow the School's referral process (see table 'Whom to report a disclosure or concern' below). If a member of the School's staff discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Specific safeguarding issues and statutory framework and guidance**

In addition to these five categories of abuse, there are a number of particular safeguarding issues specified by KCSIE.

Staff are aware that both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This type of abuse can be a one-off occurrence or a series of incidents over time, taking place online or in person, and children can be exploited even when activity appears consensual.

Staff are made aware that some forms of behaviour (e.g. drugs) put children at risk of abuse, and that abuse can be peer on peer. Below is the list of issues that could arise at the School. For guidance on these issues, [staff should follow the hyperlinks in KCSIE](#).

- Bullying including cyberbullying
- Children missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Child criminal exploitation
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs, youth and honour-based violence
- Gender-based violence/ violence against women and girls (VAWG)
- Hate crimes
- Homelessness

- Mental health
- Missing children and adults strategy
- Peer on peer
- Private fostering
- Preventing radicalization
- Relationship abuse
- Sexting
- Sexual violence and sexual harassment
- Trafficking
- Upskirting

### **Preventing radicalisation<sup>4</sup>**

Under the Counter-Terrorism and Security Act, 2015, the School has a duty to prevent people from being drawn into terrorism. Staff must be ‘able to identify children who may be vulnerable to radicalisation, and know what to do when they are identified.’<sup>5</sup> Radicalisation is the adherence to extremist views, which are defined as ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.’ We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.’<sup>6</sup> If a member of staff has a concern about a boy adopting extremist views or becoming radicalized, he or she should immediately report the concern to the DSL as he or she would do with any other safeguarding concern. The DSL will assess the level of risk that the boy poses to the school and wider community and initiate adequate procedures. The DSL will also decide the best level of communication with the relevant parents.

Where there is evidence of radicalisation, cases should be reported to external agencies.

City of Westminster Prevent team

**Email** [prevent@westminster.gov.uk](mailto:prevent@westminster.gov.uk)

**Tel** 020 7641 6032

Belgravia Police Station (Metropolitan Police Service)

**Tel** 101 (non-emergency number)

DfE mailbox/ helpline

**Email** [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

**Tel** 020 7340 7264

As with all referrals, in normal circumstances concerns will be handled by the DSL; however, any member of staff may contact the above agencies if necessary.

### **The right course of action: cases of significant harm and cases where support is needed**

The School will respond to safeguarding concerns according to the situation. If there is reason to believe that a child has suffered significant harm then a referral to the LADO, social services or,

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<sup>4</sup> For an overview of the duty to prevent radicalisation see KCSIE, Annex A.

<sup>5</sup> [Prevent](#), 5.

<sup>6</sup> Ibid.

in an emergency, the police will be made immediately. If there is evidence that significant harm has not been suffered but a child would benefit from additional support, then, in consultation with the LADO, an inter-agency assessment will be made, in the form of a 'Common Assessment Framework' (CAF) or 'Team around the Child' (TAC) strategy. Parental permission is not required for the School to initiate this action. This procedure also applies in the case of serious harm being caused to a pupil by another pupil(s), in which case the perpetrator would also be treated as being 'at risk'.

### **'Early help'**

Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment. Staff are trained to be vigilant in observing any particular problems a child may be facing. As well as speaking directly to the DSL, staff have the opportunity at regular pastoral meetings to raise concerns where the concerns they have identified can be shared, enabling prompt action.

Any child may benefit from early help, but School staff are trained to be particularly alert to the potential need for early help for a child whom some of the below may be applicable:

- has special educational needs;
- is showing signs of being drawn in to anti-social or criminal behaviour;
- goes missing from home or School;
- has challenging family circumstances;
- is showing early signs of abuse and/or neglect;
- or is at risk of being radicalised or exploited.

All staff should be aware of the early help process, and understand their role. This includes:

- identifying emerging problems and potential unmet needs;
- liaising with the DSL;
- sharing information with other professionals to support early identification and assessment;
- in some cases, acting as the lead professional in undertaking an assessment of the need for early help.

### **Peer on peer abuse**

Abuse is not always inflicted by an adult on a child; it can be inflicted by a child on another child. The School will be equally vigilant in observing the signs and symptoms of abuse within peer groups and treat cases with the same degree of seriousness: abuse is abuse.

Peer on peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to:

- serious bullying (including cyber-bullying);
- physical abuse (such as hitting, kicking, shaking, biting, hair pulling,) or otherwise causing physical harm;

- sexual violence and sexual harassment;
- serious youth violence, hazing and initiation rituals;
- harmful sexual behaviour and sexting;
- and gender-based violence.

It can be difficult to distinguish between abusive behaviour, which should be dealt with in accordance with the procedures set out below, and behaviour which does not constitute abuse, such as low-level bullying (where the School's policies on anti-bullying or pupil behaviour should be followed).

Factors which may indicate that behaviour is abusive include, but are not limited to, the following:

- where it is repeated over time and/or where the perpetrator intended to cause serious harm;
- where there is an element of coercion or pre-planning;
- and where there is an imbalance of power, for example, as a result of age, size, social status or wealth.

Signs that a pupil may be being abused are outlined above (**Signs and symptoms of abuse and neglect**).

The School has the following procedures to minimise the risk of peer on peer abuse:

- allegations of peer on peer abuse are recorded, investigated and dealt with promptly, most likely by the Deputy Head (Pastoral)/DSL and deputy DSLs;
- victims, perpetrators and any other child affected by peer on peer abuse are supported by School, working alongside parents and the School counsellor and, when necessary, external agencies (e.g. the police, social service and CAMHS);
- the School actively seeks to prevent all forms of peer on peer abuse by educating pupils and staff, challenging attitudes that underlie such abuse, and encouraging a culture of tolerance and respect amongst all members of the School community. The well-being of the day boys and choristers is closely monitored in weekly minuted staff meetings;
- peer abuse is not tolerated or passed off as “banter” or “part of growing up”. Boys are reminded of this frequently, including during assemblies, PSHCE and form time, and the sanctions for peer on peer abuse and bullying are well known and serious;
  
- the boys are taught that all peer on peer abuse is unacceptable, it is explained that it is more likely that girls will be victims, and they are told what to do if they witness or are victims of such abuse. Boys and staff are made aware of the different forms peer on peer abuse can take during staff training, assemblies, form time and PSHCE.

The School is aware that peer on peer abuse can often involve social media and the internet, and therefore pupils all attend an annual cyber-bullying workshop at School. All phones and internet-enabled devices are handed in during the school day.

#### **Actions following a report of peer on peer abuse**

As with potential abuse by adults, if a staff member has any concerns about peer on peer abuse, s/he should discuss these with the DSL or the Deputy DSL. Where the DSL considers or suspects

that the behaviour might constitute abuse, the LADO should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with the LADO and agree on a course of action.

The School's processes to support the victim, perpetrator and any other children affected include the following:

- assess and mitigate the risk posed by the perpetrator to the victim and to other children through a risk assessment;
- treat all children (whether perpetrator or victim) as being at risk; while the perpetrator may pose a significant risk of harm to other children, they may also have unmet needs and be at risk of harm themselves;
- take appropriate action in respect of the perpetrator; any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include the risk the perpetrator, their own unmet needs, the severity of the abuse and the causes of it.
- provide on-going support to the victim including by ensuring their immediate safety, responding promptly and appropriately to the abuse, assessing and addressing any unmet needs, monitoring the child's wellbeing closely and ensuring that he receives on-going support from all relevant staff members (including the School counsellor) and engaging with the child's parents to ensure that the child's needs are met in the long-term;
- and consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example, equalities work, better supervision around the School, raising awareness for staff, pupils and parents about a particular form of abuse, and additional training for staff.

### **Sexting**

Sexting is defined here as 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Creating and sharing sexual photos and videos of under-18s is illegal.

The School has regard to the guidance contained in: [Sharing nudes and semi-nudes](#).

Disclosures of harmful and abusive behaviours or sexual harassment, both on or off site or online will be treated under the following procedures:

- The incident should be referred to the DSL as soon as possible;
- The DSL should hold an initial review meeting with appropriate School staff;
- There should be subsequent interviews with the pupils involved (if appropriate) parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the pupil at risk of harm;
- At any point in the process if there is a concern a pupil is in need or at risk of harm a referral should be made to children's social care and/or the police immediately, in accordance with the procedures set out in this policy.

### **Actions following a report of sexual violence and/or sexual harassment by a child**

In responding to a report of sexual violence and/or sexual harassment by a child, the DSL will conduct a risk assessment with consideration for the victim, the alleged perpetrator/s and other children at the School. The following considerations will also be included<sup>7</sup>:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- that appropriate ongoing support is provided to the victim, perpetrator and/or any other child affected, in consultation with external agencies, where appropriate;
- the developmental stages of the children involved;
- any power imbalance between the children;
- any ongoing risks to the victim, other children, adult students or school or college staff;
- other related issues and wider context.

The School will consider the four likely scenarios when it manages reports of sexual violence and/or sexual harassment:

- 1. Manage internally**
- 2. Early help**
- 3. Referrals to social care**
- 4. Reporting to the police**

Any report of peer-on-peer sexual violence and/or sexual harassment is considered on a case-by-case basis by the DSL, and in line with statutory guidance, before any action is taken.

### **Children with special educational needs and disabilities**

Children with SEN and disabilities may be particularly vulnerable and, moreover, there may be ‘additional barriers... when recognizing abuse and neglect in this group of children’.

- Staff should not assume that possible indicators of abuse are in such cases symptoms of the SEN/disability;
- Staff should be especially vigilant as ‘children with SEN and disabilities can be disproportionately impacted by things like bullying – without outwardly showing any signs’. They can also be more prone to peer group isolation than other children;
- Children with SEN/disability may struggle to communicate their problem.

Additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

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<sup>7</sup> [Sexual Harassment & Sexual Violence Advice](#) (Paras. 61-63)



- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;

The SENCO has a particular responsibility to liaise with the DSL and other staff in identifying causes for concern and whether any extra pastoral support is required such as IEPs and other support plans, where appropriate.

### Serious violence

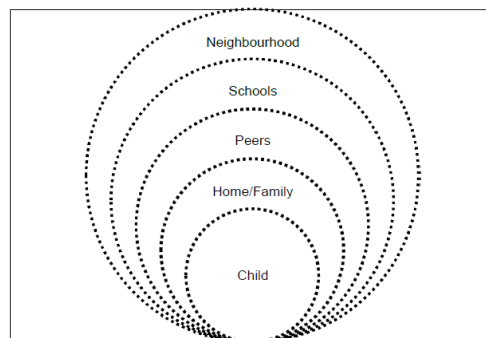
Staff are made aware of indicators which may signal that children are involved with serious violent crime. These include:

- Increased absence from school
- A change in friendships or relationships with older individuals
- A significant decline in performance
- Signs of self-harm
- Unexplained gifts or new possessions

The School has reference to [Preventing youth violence and gang involvement](#) in addition to [When to Call the Police – Guidance for schools & colleges](#)

### Contextual Safeguarding

The School also takes into account the concept of [Contextual Safeguarding](#) and the need to engage with the dynamics at play in extra-familial, as well as familial settings, and the impact this may have on the behavior of the pupils at the school, as shown below:



Contextual safeguarding is discussed during the annual safeguarding training.

pastoral staff meetings and during

### Mental health & wellbeing

The boys’ mental, as well as physical, wellbeing is of paramount importance to the School. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Weekly pastoral meetings highlight any potential issues with mental health and staff are aware of the potential links between mental health problems and a child suffering from abuse, neglect or exploitation.



Form Tutors know to speak to the DSL about any mental health concerns and the School counsellor offers weekly professional guidance to support boys and their families who may need it.

## 2. RECEIVING AND RESPONDING TO DISCLOSURE

### **Guidance to staff on receiving a disclosure**

The School promotes a culture of safeguarding in which every employee and volunteer feels able, and knows how, to receive and act upon a concern or a disclosure. It is important that staff know that if a child asks to speak to them they should listen to what they have to say, and not tell them to speak to another member of staff, e.g. the DSL. Any member of staff can receive a disclosure and must then refer the matter to the relevant person immediately (see the next section, ‘Arrangements for dealing with allegations of abuse against teachers and other staff’).

Staff are trained to give the following advice if they receive a disclosure from a pupil:

- provide a safe and reassuring environment for the boy to make the disclosure, while not promising confidentiality;
- listen to the disclosure without expressing any personal opinions (such as expressing horror or disbelief);
- if questions are needed, then ask open questions (e.g. ‘what happened?’) rather than leading questions (e.g. ‘does he kick you often?’);
- do not photograph any visible injuries or ask the boy to remove any clothing in order to inspect injuries he refers to in his disclosure;
- explain that the information will be passed on to the DSL or, in his/her absence, the Deputy DSLs (or another member of the SMT);
- do not take notes during the disclosure, but make a factual, contemporaneous note immediately after the disclosure, using exact phrases, names, dates and times wherever possible, noting and describing any visible injuries; sign and date the disclosure, or send it to yourself via email;
- where the disclosure includes an online element, do not view or forward illegal images of a child;
- inform the DSL and/or children’s social care.

### **Knowing to whom to make the referral**

Any member of staff may receive a disclosure, allegation or concern, and staff are trained to know who to then refer the disclosure to, and how quickly they must do so. Staff are trained that the passing on of information, however small it may seem, could be critical in keeping a child safe and they are made aware of the seven golden rules for sharing information<sup>8</sup>. It should be noted that, as any member of staff can receive a disclosure, so any member of staff can contact the LADO if deemed necessary, or, in an emergency, the police. However, in normal circumstances staff will adhere to the following procedure. In the case of an allegation made against a member of staff (other than the Head and DSL), both the Head and DSL should be notified, per the diagram on page 8 of this policy.

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<sup>8</sup> [\*Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers, July 2018\*](#)

### 3. ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF

In [KCSIE](#), the government has issued statutory guidance for schools, local authorities and police to follow when a potential child protection allegation is made against an employee, governor or volunteer at the School.

#### **Aim of the School's procedures**

The School aims to effectively manage situations where allegations are made against an individual who may pose a risk of harm if continuing to work with children in their present position or another capacity. The member of staff or volunteer may be alleged to have:

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

This procedure also applies where the abuse did not occur at School. Allegations against a teacher who is no longer teaching, and all historical allegations, should be referred to the police.

#### **The School's complaints procedure**

The School's formal Complaints Procedure is available at: <http://www.choirschool.com/downloads.html>. Parents may request a hard copy from the School office.

#### **Timescales**

During term time, the School aims to keep to the following timescales. Unsubstantiated or malicious allegations should be resolved within one week. Allegations that do not require formal disciplinary action should be resolved within three working days. Disciplinary hearings should be held within 15 days.

#### **Initial considerations**

- **Local/ internal process**

The School will judge carefully how serious the allegation is; not all allegations will warrant a police investigation or need to be referred to the LADO, although the LADO's advice will always be sought. In all such cases, the School will be able to resolve the case without delay.

- **External process**

Where allegations are serious, the School will involve the LADO and/or the police. Whoever has received the allegation should fully brief the DSL who will contact the external authorities (though anyone can make a referral).

#### **Categories of outcome<sup>9</sup>**

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<sup>9</sup> KCSIE, para 381.

In judging the outcome of allegation investigations, the School will use the following terminology.

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

### **Initial steps**

In circumstances where the allegation concerns the Head Master or DSL, the procedure illustrated in the table on page 8 of this policy ('Whom to report a disclosure or concern') should be followed. Concerns about boys or parents must go straight to the DSL; about school or cathedral staff and volunteers straight to the Head; about the Head to the Chair of Governors; about the Chair of Governors to the LADO.

On receipt of the allegation, the Head Master (the 'case manager') will immediately discuss the allegation with the DSL (the 'designated officer'). This discussion will establish the nature, content and context of the allegation and agree a course of action. The DSL will always contact the LADO within one working day to inform him or her about any allegation made about any member of staff or supply staff, and any further action, including referral or investigation, will be determined by following the LADO's advice.

If the allegation concerns an adult who works or volunteers for Westminster Cathedral, and whom is in contact with pupils at WCCS, the Head and the DSL should be informed. The DSL will liaise with the Cathedral Safeguarding Representative and the Cathedral Administrator.

### **Cathedral Administrator**

Tel 020 7798 9374

In these circumstances any further investigatory or disciplinary action will be matters for the Cathedral to handle, sharing information as appropriate with the LADO and the School. However, it remains entirely within the School's discretion whether to permit or prohibit the individual concerned from having contact with its pupils whilst any safeguarding referral or investigation is underway, and indeed – depending on the outcome of any referral or investigation – thereafter.

A similar process will be followed with any other third party provider where the safeguarding concern relates to a member of their staff.

The Cathedral follows the Catholic Safeguarding Advisory Service's national policies for the Catholic Church in England and Wales. These may be found [here](#).

The DSL will ensure that the Cathedral's safeguarding representative reports any such allegation to the LADO and, should this not happen, will report the allegation to the LADO within one working day himself/herself.

**If no further action is deemed necessary**

Where a decision is made that no further action is deemed necessary, the Head Master and DSL should both make a record of why they reached this judgement. They will also discuss what information should be put in writing and communicated to the individual concerned. Then they will decide what action with regard to both parties, particularly where they may come into contact with one another. The Head Master will consider appointing mentor(s) for one or both parties in the short term.

**Informing the accused party**

Where a decision has been made by the Head Master and DSL that external agencies do not need to be contacted, the Head Master will inform the accused person of the details of the allegation. However, where the case is more complicated or serious and a strategy discussion is needed, the Head Master should delay this conversation until guidance has been received from the LADO and/or the police.

**Suspension**

In exercising his duty of care both to children and employees, the Head Master will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the School or whether alternative arrangement can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step. The School should consider the impact on the person if they are subsequently reinstated. Further details on suspension are outlined in [KCSIE](#).

**Boarding accommodation**

Where a member of staff with accommodation in the School is subject to a child protection allegation, the School will provide alternative accommodation during the investigation.

**Where a child is suffering or is likely to suffer significant harm<sup>10</sup>**

Where there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#) (particularly on making an assessment). If the allegation is about physical contact, the discussion should have regard to the use of reasonable force in certain circumstances.

**Deciding on an outcome**

When an outcome has been decided, the Head Master and DSL should discuss – with the Governor for safeguarding – the next steps available. This will range from taking no further action to dismissal or a decision not to use the person’s services in future. Suspension should not be the default position. Where the best course of action is unclear, the School will seek guidance from the LADO.

**Police and local authority investigations**

Where the police or local authority carry out an investigation, the School will ask them to obtain consent from the individuals involved to share their statements and evidence for use in the School’s disciplinary process. This will enable the School to take appropriate action promptly after the conclusion of the police and/or local authority investigation/court case.

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<sup>10</sup> KCSIE, para 66

### **Non-cooperation from the accused**

Where the accused person's period of notice expires or where he/she refuses to cooperate, the School must nevertheless reach a conclusion in the investigation.

### **Confidentiality**

The parents or carers of a child or children involved in the allegation should be told about it as soon as possible if they do not already know of it. However, if a strategy discussion is required, or police or local authority agencies need to be involved, then parents should be informed after those agencies have been consulted. As the case proceeds, parents should be kept informed of its progress. Any disciplinary hearing will be confidential, though the parents or carers should be told the outcome in confidence.

Parents should be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing.<sup>11</sup>

### **Duty of care to employees**

The School has a duty of care to its employees. The School will provide effective support to any member of staff facing an allegation. In the case of suspension, the member of staff will be given a named contact/mentor and advised to contact their professional association or other organisation for support. The mentor will inform them of the process of the case and other work-related issues. The person against whom the allegation has been made should not be prevented from social contact with colleagues unless there is evidence that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Any allegation will be dealt with in a quick, fair and consistent manner that is in the best interests of the child and the person against whom the allegation is made.

### **Protecting the identity of the accused**

The School has a legal obligation to 'maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.'<sup>12</sup> Exceptions to this are: where the Secretary of State published information about an investigation; where the accused effectively waives their right to anonymity by going public or giving their written consent for another to do so; or where a judge lifts restrictions. Any publication, including on social media, of information that could lead to the identification of the teacher by the public, is in breach of the law.

The Head Master will take advice from the DSL, police, lawyers and LADO to decide:

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

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<sup>11</sup> KCSIE, para 371.

<sup>12</sup> KCSIE, para 375.

### **Criminal proceedings**

Following the conclusion of a criminal investigation, the School will consult with the LADO to decide whether any further action, including disciplinary action, is appropriate, and if so, how to proceed. Any criminal conviction for harming children will preclude that person from working with children again.

### **Unsubstantiated, unfounded, false or malicious allegations**

Where an allegation by a pupil is shown to be baseless, the Head Master will consider whether to take disciplinary action in accordance with the School's Behaviour Policy.

Where a parent has made a deliberately baseless allegation, the Head Master will consider whether to require that parent to withdraw their child or children from the School.

The School reserves the right to contact the police in the case of malicious allegations against staff.

Details of all allegations found to be malicious will be removed from personnel records.<sup>13</sup>

### **Record keeping**

Except where allegations are found to be malicious, full records must be kept. Where a resolution was reached, a clear and comprehensive summary of any allegations against the member of staff, and all other associated records, including the outcome of the investigation, will be retained on the person's confidential personnel file. This record will be kept until the accused has reached retirement age or for a period of 10 years if that is longer. Where a resolution was not found, records will be kept for 75 years. This will enable clarification of any future DBS checks where allegations did not result in a criminal conviction, or if a historical allegation is made.

The School will provide details of substantiated allegations in future references.

### **Review – learning lessons<sup>14</sup>**

Where an investigation has occurred, the DSL will immediately review the School's safeguarding procedures and prepare a report for the Governors' Pastoral Committee. Where a substantiated allegation has been found, the DLS should consult with the LADO on the efficacy of the School's procedures or practice (including any disciplinary action taken), to ensure the best possible future safeguarding of children.

### **Supply staff**

The School may have to consider an allegation against an individual not directly employed by them, for example, supply staff provided by external agencies. Whilst the School is not the employer of supply staff, allegations of potential abuse would not be viewed any differently; the School understands its legal responsibilities and would ensure allegations are dealt with properly, and referred to the LADO before any final decisions are taken. The School would also take the lead in handling any allegations.

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<sup>13</sup> KCSIE, para 397.

<sup>14</sup> KCSIE, para 402.



### **Contact with the LADO once a disclosure has been made**

Once a disclosure against anyone working at the School has been made, the School will act without delay, reporting the allegation to the LADO within one working day. Only after notifying and consulting with the LADO (or, in the most serious cases, the police) will the School undertake an investigation. If the case is thought to be borderline, then the School should still contact the LADO and discuss the matter informally.

The DSL will discuss the nature, content and context of the allegation with the LADO, as well as what information should be shared with the parents and whether the person about whom the allegation concerns should be suspended. The LADO will also advise whether the police should be informed. Written records (e.g. a follow-up email) will be kept.

### **Confidentiality and publicity**

Once the LADO has been fully informed of the disclosure/allegation, the School should do what it can to maintain confidentiality and guard against unwanted publicity. This is so as to avoid prejudicing any criminal proceedings, and applies until the person is charged with an offence or the DfE/TRA publish information about an investigation or decision in a disciplinary case.

### **Reporting to the Disclosure and Barring Service (DBS)**

If a member of staff is found to have caused harm or posed a risk of harm to a child and has been released from service, then the School will promptly report them to the DBS. The School will supply full details to the DBS and recognises its legal obligation to do so. This applies to staff who have been dismissed, whose fixed-term contract has not been renewed, ceasing to use a supply teacher, terminating the placement of a student teacher or other trainee, ceasing to use staff employed by contracts, no longer using volunteers, resignation, voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering. The School must not make a 'compromise agreement' that includes non-referral to the DBS. Nor does a refusal to co-operate by the person receiving the allegation constitute a reason not to inform the DBS. The School will also confirm to ISI inspectors that it has reported to the DBS all instances of action in relation to safeguarding concerns.

### **Reporting to the Teaching Regulation Agency (TRA)**

In addition to reporting to the DBS, the School will also notify the TRA of any teacher who has been dismissed (or who would have been dismissed had they not resigned) and who may require a prohibition order. A prohibition order is appropriate in cases of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence.' The School will have due regard to the guidance in [\*Teacher misconduct: the prohibition of teachers\*](#) (July 2014).

#### 4. CODE OF CONDUCT FOR STAFF

##### **Purpose of this policy**

The purpose of this code of conduct for staff is to provide staff with guidance on establishing the safest possible learning and working environment, safeguarding children and reducing the risk of false accusations of improper or unprofessional conduct.

##### **Statutory and regulatory framework of this policy**

It has regard to DfE document [\*Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings\*](#) (2009), the requirements of the relevant sections of the [\*Education \(Independent Schools Standards\) Regulations \(England\)\*](#) (2014) and the ISI regulatory handbook (2015).

##### **Binding nature of this policy**

Staff at the School agree to, sign and must adhere to the following code of conduct.

##### **Principles of this policy**

- The welfare of the child is paramount (Children's Act 1989).
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Staff should work, and be seen to work, in an open and transparent way.
- Staff should discuss and/or take advice promptly from the Head of Department, Head of House or member of the SMT (which comprises the Head Master, Deputy Head Master (Pastoral), Deputy Head Master (Academic), Director of Studies and Bursar) over any incident which may give rise to concern.
- Records should be made of any such incident and of decisions made/further actions agreed.
- All staff know that the Deputy Head (Pastoral) is the DSL, and the Deputy Head (Academic)/Head of Boarding and the Head of Pre-Prep are the Deputy DSLs. All staff should be familiar with local child protection arrangements and understand their responsibilities to safeguard and protect children. This information is contained in the Safeguarding and Child Protection Policy, which is on the staff drive (intranet) and on the School website.

##### **Understanding and adherence to School policies and statutory framework**

Staff at the School read, understand and agree to the contents of the School's safeguarding and child protection policy and Part 1 of KCSIE. They also understand and agree to the School's procedures for receiving disclosures and making referrals.

##### **Exercise of professional judgement**

While this staff code of conduct and the guidance it draws from and points to hope to provide a reliable guide, there will be occasions and circumstances in which staff have to use their professional judgement in order to safeguard the best interest of pupils. The opportunity for developing this professional judgement is provided principally through induction, INSET, staff meetings and further training courses. The Deputy Head (Pastoral) is responsible for coordinating INSET training for all staff, academic and non-academic, and identifying any need for further training. Staff must read the School's policies relating to staff conduct and seek clarification of anything that they find unclear.

### **Criminal and disciplinary action**

Staff should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them. The School's disciplinary procedure document is on the staff drive (intranet) and gives further details of what would constitute gross misconduct (see Disciplinary Procedure, 4.7). The safeguarding and child protection policy outlines the School's responsibilities and procedures for reporting to external agencies allegations of practices of behaviour which have put (or may have put) pupils at risk of significant harm.

### **ICT**

The staff ICT policy gives further guidance on safe use of ICT and should be read in conjunction with this staff code of conduct.

### **Duty of care**

The School exercises its duty of care in a number of ways.

- All staff have a duty to keep pupils safe and protect them from physical and emotional harm. This duty is carried out partly through the development of respectful, caring and professional relationships between staff and boys and behaviour by staff that demonstrates integrity, maturity and good judgement.
- The School as an employer has a duty of care to its employees under the Health and Safety at Work Act 1974. The School must provide a safe working environment and guidance about safe working practices.
- Employees also have a duty of care under the same Act towards themselves and anyone else who might be affected by their actions or failings. Staff should therefore adhere to this code of conduct and other policies and guidance issued by the School to ensure that they behave responsibly.

### **Power and positions of trust**

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children in education are in positions of trust in relation to the boys in their care. No relationship between a member of staff and a pupil can be a relationship between equals. Staff must ensure that their relationship is in no way exploitative, with power being used for personal advantage or gratification.

### **Confidentiality**

Members of staff may have access to personal details about pupils in order to undertake their everyday responsibilities. This information may be highly sensitive or private and must be treated in a discreet and confidential manner. Where it is shared, it must be on a need-to-know basis and never mentioned casually in conversation. Anonymity should be preserved whenever possible. However, where abuse is alleged or suspected, staff must pass on information without delay to the designated persons specified in the School's Safeguarding and Child Protection Policy.

### **Propriety and behaviour**

The most recent Teachers' Standards (July 2011, updated June 2013) issued by the Department for Education, defines the personal and professional conduct expected of staff as follows.

An adult working in regulated activity is expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a teacher's career.

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside School, by the following:
  - treating boys with dignity, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to a teacher's professional position;
  - having regard for the need to safeguard boys' wellbeing, in accordance with statutory provisions;
  - showing tolerance of and respect for the rights of others;
  - not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs;
  - ensuring that personal beliefs are not expressed in ways which exploit boys' vulnerability or might lead them to break the law.
- Teachers must have proper and professional regard for the ethos, policies and practices of the School in which they teach, and maintain high standards in their own attendance and punctuality.
- Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The Education (Independent Schools Standards) (England) Regulations (ISSRs) (2014) add that the School and its staff must do the following:

- actively promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs;
- not discriminate against boys on the basis of protected characteristics, which include: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex, and sexual orientation.

### **Gifts**

Staff should adhere to the School's Anti-Corruption & Bribery Policy, available on the staff drive (intranet).

### **Social contact**

Members of staff should not establish or seek to establish social contact with boys of the School, including communicating with pupils over social media. Such contact is inappropriate because it may entail a level of emotional dependence (on either side) that would represent an abuse of the position of trust held by a teacher. If a boy seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued. They must also report the incident to the DSL.

Similarly, staff should not share their personal contact information with boys. They are advised that there are risks in making available their personal details such as telephone numbers and home or personal email addresses. The School's internal email system should be used in accordance with the School's ICT policy.

Staff should avoid any favouritism, real or perceived, to one or more boys and should be aware of the danger of ‘grooming’, even when this is only apparent. Rewards given to boys should be in line with the School’s rewards system and equitable; boys should not receive special or personal gifts from teachers. Teachers should be aware that children can easily develop emotionally-dependent attachments to teachers, and that this should be avoided. If a teacher feels that a boy is developing such an attachment, he should report it to the DSL and seek guidance. The DSL should make an appropriate record.

### **Physical contact**

Physical contact between staff and pupils is in some circumstances appropriate. The School does not follow a ‘no touch’ approach. However, staff should ensure that contact is related to a specific need, is of limited duration and appropriate given their age, development, ethnicity and background. Sound professional judgement is required to discern whether physical contact is appropriate in a given situation as this may differ with each pupil.

Physical contact should never be secretive, be for gratification or as a misuse of authority. Should this be the case, the DSL should be notified, a record kept and appropriate action taken.

Physical contact should be ad hoc rather than regular, unless part of a formally agreed plan (e.g. in relation to pupils with SEN or a disability) in line with School policy. It is advisable to seek the child’s permission before initiating contact. Contact should then be sensitive to the child’s reaction and feelings, and contact should be as minimal and brief as possible.

Children who have suffered previous abuse or neglect ought to be treated with special consideration as physical contact may be associated with previous experience, and staff may be exposing themselves to allegations.

Some boys may seek out inappropriate physical contact (e.g. hugs, over-familiarity). In these circumstances staff should sensitively deter the child and help them to understand the importance of physical boundaries. The DSL should be notified.

### **Physical contact in the context of sport, music and other activities requiring contact**

Some staff may need to employ physical contact in sport, music or some other School activity in order to demonstrate a technique or safety procedure. This should be done with the boy’s agreement. Contact should be the minimum required and in no way secretive. Staff should be alert to any discomfort expressed by the pupil, verbal or non-verbal.

The DfE provides the following guidance:<sup>15</sup>

- It is not illegal to touch a pupil. There are occasions when physical contact, other than reasonable force, with a pupil is proper and necessary.
- Examples of where touching a pupil might be proper or necessary:
  - holding the hand of the child at the front/back of the line when going to assembly or when walking together around the School;
  - when comforting a distressed boy;
  - when a boy is being congratulated or praised;

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<sup>15</sup> [Use of reasonable force](#), p 8.

- to demonstrate how to use a musical instrument;
- to demonstrate exercises or techniques during PE lessons or sports coaching
- to give first aid.

EYFS states:<sup>16</sup>

A person will not be taken to have used corporal punishment (and therefore will not have committed an offence), where physical intervention was taken for the purposes of averting immediate danger of personal injury to any person (including the child) or to manage a child's behaviour if absolutely necessary. Providers, including childminders, must keep a record of any occasion where physical intervention is used, and parents and/or carers must be informed on the same day, or as soon as reasonably practicable.

### **Changing**

Young people are entitled to respect and privacy when changing clothes, using the toilet or taking a shower. However, an appropriate level of supervision is also necessary to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the boys concerned and sensitive to the potential for embarrassment.

Teachers may check briefly that boys are not loitering in the toilets.

Staff should follow the protocols for changing that relate to the boarding house, the classroom or the sports centre.

### **Boarding house**

*Staff should:*

- be either outside the bedroom or, if inside, in no way visually intrusive (e.g. they could be marking or reading);
- ensure that boys remain in the personal areas around their beds;
- ensure that boys follow the changing procedure below.

*When getting dressed in the morning, boys should:*

- put their underwear on under their duvets before getting dressed;
- remain in their area as they put their uniform on.

*Before showering, boys should:*

- remove shoes and socks;
- replace jumpers/shirts with dressing gown (fastened securely);
- use their towel to help protect their modesty;
- place trousers and underwear in their private area;
- put flip-flops on.

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<sup>16</sup> [Managing behaviour](#), p29

*After showering, boys should:*

- remove flip-flops;
- keep dressing gown on (fastened securely);
- use their towel to help protect their modesty;
- put underwear and trousers on;
- remove dressing gown;
- put shirt/jumper on;
- put socks and shoes on.

### **Classrooms: changing for Games**

*Staff should:*

- occupy themselves with administrative tasks while the boys are changing (e.g. they could be marking or reading) and only interact during changing with them if necessary;
- ensure that boys remain in the personal areas behind their desks;
- ensure that boys follow the changing procedure below.

*Boys should:*

- remove shoes;
- replace jumpers/shirts with School t-shirt/games shirt/tracksuit top, as appropriate;
- replace School trousers with games shorts/tracksuit trousers;
- replace School socks with white/red and purple games socks;
- put trainers on.

### **Classrooms: changing for swimming**

*Boys should:*

- remove shoes;
- replace jumpers/shirts with School t-shirt/games shirt/tracksuit top, as appropriate;
- replace School trousers/underwear with swimming trunks/tracksuit trousers;
- use their towel to help protect their modesty;
- replace School socks with white/red and purple games socks;
- put trainers on.

*In all circumstances, boys are reminded to:*

- protect their own modesty at all times;
- respect the privacy of other boys by remaining in their designated area;
- get changed quickly so that they can enjoy more free time.

### **Showers for day boys aged 11 to 13**

In line with Part 5, Premises of and Accommodation at Schools of the Regulatory Requirements, the School designates the first two showers on the left-hand side of the shower room on the third floor for use of day boys between the ages of 11 and 13 for use after physical education, and the changing space adjacent for their use too, should circumstances require it.

### **Pupils in distress**

There may be occasions when a distressed pupil needs comfort and reassurance. This may include age appropriate physical contact. Staff should be aware that their behaviour should be professional, minimal and not secretive. If the member of staff is concerned that the contact could be misinterpreted, then the DSL should be informed and a record kept.

### **Behaviour management**

All staff have a responsibility to manage the behaviour of boys to ensure the safety of all boys (and staff) in an environment suited to learning. Staff have a responsibility to follow the School Behaviour Policy when identifying offences and applying a punishment. In some cases, which may be unclear or involve more serious offences, staff should consult the Deputy Head (Pastoral) or Head of Pre-Prep for guidance. No matter what the problem, all boys have a right to be treated with respect and dignity. As in all Schools, corporal punishment is against the law and humour should not be used to demean or upset pupils. Staff should be aware that the School's anti-bullying policy applies to all members of the School community (boys, parents and staff).

### **Care, control and physical intervention**

Corporal punishment must be distinguished from the use of reasonable force, as outlined in the DfE guidance [Use of reasonable force](#) (July 2013). This guidance explains that all School staff may use force to control (e.g. 'guiding a pupil to safety by the arm') or restraint (e.g. holding a pupil back when breaking up a fight) when exercising their duty of care, and staff are mindful in recognizing the additional vulnerabilities of children involved in incidents with SEN or disabilities or with medical conditions. Reasonable force means 'using no more force than is needed' and taking every step to avoid injury. Reasonable force can be used to prevent pupils from 'hurting themselves or others, from damaging property, or from causing disorder.' The decision whether to physically intervene 'is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances.' The Deputy Head (Pastoral) should be informed when force has been used on a child, and will automatically refer every instance to parents and ensure the matter is recorded.<sup>17</sup>

### **Sexual contact with pupils**

Any sexual behaviour by a member of staff with or towards a pupil (or any other child) is both inappropriate and illegal under the Sexual Offences Act 2003. Illegal sexual activity includes penetrative and non-penetrative acts and also non-contact activities, such as exposing children to pornography. If any allegations of sexual contact with pupils are made, the School will immediately operate the procedures outlined in this policy and take advice from the LADO, which could give rise to suspension of the member of staff whilst the matter is investigated.

### **One-to-one situations**

Some staff work with boys in one-to-one situations, such as instrumental music lessons, and this arrangement may make them more vulnerable to allegations. They should do what they can to ensure that their conduct is transparent (for example, positioning the lesson near the window in the door). Wherever possible, the door should be left open. Staff should not meet boys in secluded areas of the School. If a pupil becomes distressed, then the member of staff should report this to the Deputy Head (Pastoral).

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<sup>17</sup> [Use of reasonable force](#), p 7.



### **Transporting pupils**

The School does not allow the transport of boys by staff in private or hired vehicles where a member of staff is driving. Staff should only use public transport or a registered taxi car. All transport plans should be made with the Deputy Head (Pastoral) and parents should be informed. Staff are advised to avoid situations where they are alone with a pupil in a vehicle. Finally, when transporting a pupil, staff act *in loco parentis*, meaning they have a duty of care towards the pupil until he is handed over to a parent/carer.

### **Boarding, educational visits, sports and after-school activities**

A less formal tone may be appropriate during boarding time, at a sports fixture or on a School trip, but staff must remember that they remain in a position of trust and that they should not be behaving in such a way as to be accused of seeking to establish an inappropriate relationship or friendship.

Staff have a responsibility to respect the personal area of a boarder and should not interact with boys who are getting changed. Likewise, staff should not in any circumstances sit or lie down on a boy's bed.

For restrictions on physical contact, see the above section.

Where School activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Staff bedrooms, washing and lavatory facilities should be separate from those of the boys. While boys can alert staff to any issues that concern them by knocking at the door of private staff accommodation, they are not allowed to enter private staff accommodation in any circumstances, other than *in extremis*.

### **Drinking alcohol**

Staff should not consume alcohol while exercising their duty of care to pupils. However, in circumstances (e.g. at an evening function) where alcohol may be consumed, on duty staff should not exceed the drink drive limit for the country they are in.

### **First Aid and the administration of medication**

Information about boys with specific allergies or medical needs is displayed in the Staff Rooms in each school and in the Medical Room in the Prep School.

In the event of an emergency, staff should dial 999 and ask for an ambulance.

The School has a number of trained first aiders (listed in both Staff Rooms and the Medical Room). Staff are not required to undertake statutory First Aid training unless they are matrons or undertaking medical duty in the boarding house. Staff qualified in First Aid should also receive training in administering the relevant medications used at the School. All academic staff (including non-First Aiders) should be shown how to administer certain emergency medications (such as an epipen), especially if they are leading an off-site visit or trip that includes one or more boys who require emergency medication. Wherever possible, medication should be administered by Matron or a First Aider.

Parental consent (via form, letter, telephone, email, text) is needed before giving any medication to a pupil, including over-the-counter medicines such as paracetamol, ibuprofen or antihistamine.

Parents sign an in loco parentis form at the beginning of the academic year to grant the school permission to act in the best interests of their son in an emergency.

### **The curriculum**

Some aspects of the curriculum – in Science, Religious Studies, Relationships Education and RSE– will include, or may easily run into, subject matter of a sexual or sensitive nature. Care should be taken that resources do not offend the modesty of pupils and that the lesson does not stray from the learning objective. Boys may ask questions that it would be inappropriate to answer. Some discussions may be more appropriately discussed away from a whole-class forum, and staff should consult the Deputy Head (Pastoral) for guidance.

Staff should follow the School’s Relationship & Sex Education Policy (RSE) in the Staff Handbook (on the staff drive/intranet).

If you or a pupil have felt uncomfortable by a discussion that has taken place, it should be reported to the DSL as soon as possible. The circumstances should be recorded in writing as soon as possible and, if appropriate, a copy placed on the child’s file.

Staff should be alert to anything that would constitute a disclosure, in which case they should follow the School’s disclosure procedure in the Safeguarding and Child Protection Policy.

All staff at the School, Catholic or otherwise, have a duty to uphold the moral teachings of the Catholic Church as defined in the [Catechism of the Catholic Church](#) and other documents of the Magisterium. At the same time, teachers should be clear about the binding nature of the law (e.g. pertaining to the Marriage (Same Sex Couples) Act 2013).

As stipulated in the [Independent School Standards Guidance](#) (2019) teachers should avoid ‘the promotion of partisan political views in the teaching of any subject in the school.’<sup>18</sup> The presentation of topics should be balanced. With regard to radicalisation, government advice is that ‘the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.’<sup>19</sup>

The school’s RSE policy, revised for September 2021, is available to parents on the website.

### **Photography, videos and other creative arts**

Many School activities involve recording images, which are undertaken as part of the curriculum, extra School activities, for publicity, or to celebrate achievement.

Parental permission for using images for publicity purposes is sought from parents when their son joins the School.

Staff should follow the taking, using and storing images of pupils policy in the staff handbook (on the staff drive/intranet). Staff should think carefully about the pictures they take and avoid any inappropriate or demeaning photographs or videos.

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<sup>18</sup> [Independent School Standards Guidance](#) (2019), Part 2, 3.19

<sup>19</sup> [Prevent](#), 5.

### **Protocols for storing images and the use of mobile phones and cameras**

Staff should save images on the School's shared drive. Any images of boys in either the Pre-Prep, including EYFS, or Prep School, should be taken on school cameras. Staff, visitors or volunteers must not use personal cameras or phones to photograph boys.

### **Whistleblowing**

Whistleblowing is the mechanism by which staff can voice their concerns, made in good faith, without fear of repercussion. The School has a whistleblowing policy as part of its safeguarding and child protection policy (see Section 4 of this policy, below) that meets the terms of the Public Interest Disclosure Act 1998 and aims to support staff in appropriately reporting any concerns. Staff are obliged to read and adhere to this policy in full.

Staff members are expected to understand and take seriously their individual responsibilities to bring matters of concern to the attention of senior management and, where necessary, relevant external agencies. This includes concerns about the behaviour of another staff member in addition to concerns about poor or unsafe practices or potential failures in the School's safeguarding regime.

### **Sharing concerns and recording incidents**

All staff should be aware of the School's child protection procedures, including procedures for dealing with allegations against staff. Staff who are the subject of allegations are advised to contact their professional association or seek legal advice.

Any concern or incident should be clearly and promptly recorded and reported to the DSL or the relevant person indicated by the table ('Whom to report a disclosure or concern') on page 8 of this policy. Early discussion with a parent or carer may help avoid any misunderstanding.

Members of staff are encouraged to discuss with the Head of House, Head of Department or member of the SMT any difficulties or problems that may affect their relationship with boys so that appropriate support can be provided or action can be taken.

### **Disclosure and barring service**

All staff are subject to an enhanced Disclosure and Barring Service check before taking up their positions at the School. It is the responsibility of members of staff to inform the Head Master in confidence if they are charged with a criminal offence whilst in the employment of the School.

### **Disqualification under the Childcare Act (2006)**

Staff are made aware that they are committing an offence if they are disqualified from teaching under the Disqualification under the Childcare Act (2006) and they do not notify the School.

Disqualification criteria includes being on the Disclosure and Barring Service (DBS) Children's Barred List or where a child has been made subject of a care order due to the care of a member of staff; a complete outline of disqualification criteria can be found [here](#)<sup>[1]</sup>.

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<sup>[1]</sup> Disqualification under the Childcare Act 2006, updated 31<sup>st</sup> August 2018



Since the introduction of GDPR in May 2018, staff do not need to provide details about any convictions that are not relevant to the childcare disqualification legislation.

In applying to work at WCCS, there is a declaration that staff are not disqualified from working with children and new employees have an enhanced DBS; all staff are aware they are obliged to inform the School if their circumstances change.

The Data Protection Act 2018 and GDPR do **not** prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of the pupils.

## 5. WHISTLEBLOWING PROCEDURES

The following whistleblowing procedure has regard to [Working Together to Safeguard Children](#), [Keeping Children Safe in Education](#), and [Whistleblowing for employees](#).

The School has an obligation to adhere to the law, to the statutory framework specific to it as a School, and to follow best practice, particularly in safeguarding and health and safety. Within this ethos, the School trains its employees to report concerns to the relevant senior members of staff, the governing body and external agencies. The School engages its staff through meetings, committees and other means as a means of valuing their perspective and reflecting on the School's practice. Staff are trained to know how to report a concern. The Safeguarding Policy in particular explains in detail the responsibility of every member of staff to safeguard children and that any member of staff can make a referral to the LADO.

### **Definition and scope of whistleblowing**

A whistleblower is an employee who reports wrongdoing at work that is of public interest. Whistleblowing means reporting something that affects others.

Whistleblowers are protected by law, which means that they will not be treated unfairly or lose their job because they 'blow the whistle' on malpractice. Concerns can be raised regarding incidents from the past, in the present or may be believed to be happening in the near future.

It is important to remember that a compromise agreement may not bind an employee (or former employee) from reporting a concern and blowing the whistle.

Examples of what an employee may blow the whistle on under the law.

- A criminal offence, e.g. fraud or abuse.
- Endangering someone's health and safety.
- Risk or actual damage to the environment.
- A miscarriage of justice.
- If the School is breaking the law.
- If someone is covering up wrongdoing.
- Failures in the School's safeguarding provision

It should be noted that, unless it is in the public interest, employees who raise grievances (e.g. bullying, harassment, discrimination) are not covered by whistleblowing law. Such grievances should be raised under the School's grievance procedure in the Staff Handbook (on the staff drive/intranet).

### **Raising unfounded and malicious concerns**

Within a culture of safety employees are asked to raise legitimate concerns in good faith, with the assurance that their position will not be prejudiced. If, however, concerns are raised that are deliberately unfounded, malicious or mischievous, this may constitute an offence in itself, and the employee may be subject to the School's disciplinary procedure, including gross misconduct and dismissal.

### **Further information about whistleblowing**

Further information about whistleblowing is available for employers and employees from the charity [Public Concern at Work](#).

### **Whom to inform**

If the matter is a child protection concern, the staff should follow the procedure for making a referral as outlined in the safeguarding and child protection policy, sections 1 and 2.

Who a member of staff informs will depend on who the concern is about and the nature and seriousness of the concern. In the first instance, the whistleblower may choose to raise the matter internally. This enables the School to address the issue and, where possible, to correct, clarify or explain their behaviour, and, where necessary, to take further action.

The School has identified the Head Master and Chair of Governors as the correct people to receive a concern from a whistleblower. The whistleblower is free to choose whether to communicate in person, by telephone or by writing (letter or email, marked private and confidential). Anonymity will be preserved wherever possible.

Mr Neil McLaughlan  
Head Master  
Westminster Cathedral Choir School  
Ambrosden Avenue  
London SW1P 1QH  
**Tel** 020 7798 9395 **Mobile** 077 3177 8725

David Heminway  
Chair of Governors  
Westminster Cathedral Choir School,  
Ambrosden Avenue  
London SW1P 1QH  
**Mobile** 077 1194 7137

### **The School's procedure**

Once a concern has been raised the Head Master or Chair of Governors will carry out a preliminary investigation. The resulting assessment may identify the need to involve third parties for further information, advice or assistance; for example, other staff, external auditors, legal or personnel advisers, the local authority or the police. Written records will be kept and appropriate action taken promptly, including, as appropriate, disciplinary action or referral to an external agency.

The whistleblower may be provided with information regarding the outcome of the investigation and is entitled to press for further action if unsatisfied with the process or its outcome.

### **Fear of blowing the whistle**

If a member of staff feels unable to raise an issue or feels that their genuine concerns are not being addressed, they may contact the NSPCC whistleblowing helpline on 080 0028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 6. SAFER RECRUITMENT

Safer recruitment of staff is a vital part of creating and ensuring the safety of children at the School. The School's procedures have regard to Part 3 ("Safer recruitment") of [Keeping Children Safe in Education](#) (2021), Part 4 ("Suitability of staff, supply staff, and proprietors") of the ISI regulatory handbook (April 2015) which implements the [Education \(Independent Schools Standards\) Regulations \(England\)](#) (December 2014).

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

- that staff are appointed on the basis of merit, ability and suitability for the role advertised;
- that all applicants are considered equally and consistently;
- that applicants face no unjust or illegal discrimination;
- that the School's recruitment process complies with government legislation and guidance, in particular KCSIE, and guidance issued by the DBS;
- that the School meets safeguarding requirements, in particular by carrying out the required pre-employment checks.

### Safer recruitment training

Although it is not a legal requirement in the independent sector to have one person on every recruitment panel trained in 'safer recruitment', at the School the SMT all receive this training (usually online via the NSPCC).

### Retention of records

The School will make copies of all relevant documentation submitted in the application and recruitment process. The School follows government [rules on data protection](#) and the guidance issued by ISI. Documents of successful candidates will be kept for the duration of their employment and for six months thereafter; unsuccessful candidates' documentation will be securely destroyed after six months.

### Recruitment and selection procedure

Part 4 of the [Education \(Independent School Standards\) Regulations \(2014\)](#) establishes the checks that the School must make before employment may commence. Safe recruitment consists of criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information.<sup>20</sup>

## PERMANENT STAFF

### Application process

- Via [www.tes.co.uk](http://www.tes.co.uk) or upon request from the School, candidates receive an application pack comprising of a job description, person specification and application form.
- The application form (see Appendix 1) requires the following information: personal details, education and employment history, disability or special provision required, referees and a criminal conviction declaration.
- The application form also explains the safeguarding checks that the School will undertake on any successful applicants and directs candidates to the School's safeguarding and child

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<sup>20</sup> KCSIE, para 211.

protection policy on the School website (or available in hard copy from the office), and that successful applicants will be required to demonstrate their right to work in the UK.

- A CV is not requested and may not be submitted in place of a completed application form, though candidates may submit a CV in addition to their application form, should they so wish.
- Candidates are then shortlisted by the Head Master, in consultation with SMT, and invited to interview.

### **Referees**

The School requires two references, of which one must be the current/most recent employer (i.e. the Head if the applicant is a teacher). If there is no current employer, verification of the most recent period of employment and reasons for leaving should be obtained. Where electronic references are received, the School will verify they originate from a legitimate source. Shortlisted candidates who agree to come to interview will have references gathered by the Head Master's PA, who is also trained in safer recruitment. Reference request forms include the following question: *Are there any reasons why the candidate should not have access to children? Please include any allegations or concerns that have been raised about the applicant that relate to the safety and welfare of children, and the outcome of these concerns. Please include all disciplinary offences related to children, even if 'time expired'.*

The two references must be submitted to the School in writing. Notes from any further details provided over the telephone will be recorded on the applicant's file.

### **Interview**

At interview, the panel will consist of at least one person certified in safer recruitment, who will ask the candidate some questions about safeguarding children, as well as other questions on the suitability of the candidate for the post defined in the job description and person specification.

### **Checks on identity, qualifications and right to work in the UK**

While at the School for interview, candidates will be required to verify their identity. The identity check will be made against an official document that includes photographic identity (i.e. a passport or driving licence). A second form of identity should confirm the address of the applicant (e.g. a utility bill, bank statement or similar). Candidates should also bring original certificates of any educational and professional qualifications cited in their application or requested by the School.

Finally, the School follows the Home Office guidance on checking a job applicant's [right-to-work documents](#). Any UK citizen has the right to work in the UK. Non-UK citizens must show genuine, original and unchanged documents belonging to them. These may be a passport, work visa or Certificate of Entitlement to the right of abode in the UK. Copies will be kept by the School according to its policy on retention of records.

### **Letters of appointment, acceptance and contract**

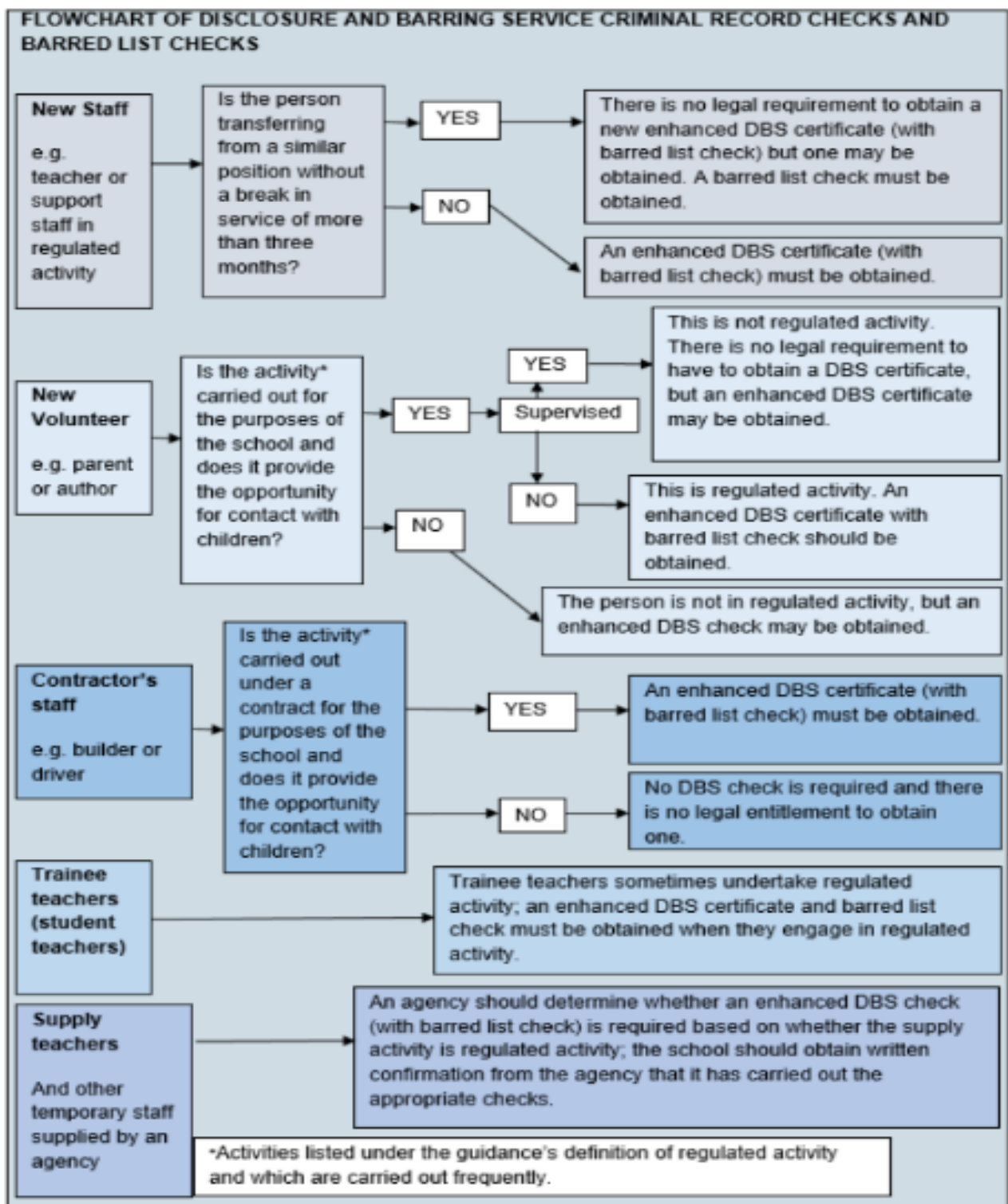
The successful candidate(s) will receive a letter of appointment which stipulates the particulars of the job offer, a contract incorporating the School's standard terms, and conditions of employment, a copy of the School's Privacy Notice, and the expected starting date subject to the submission of a medical questionnaire and further satisfactory completion of safeguarding checks by outside agencies.



### DBS checks and barred list information

All successful candidates must receive clearance at the enhanced level from the DBS before commencing employment at the School. If they are in regulated activity,<sup>21</sup> then the enhanced check must include barred list clearance. ‘For all other staff who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.’<sup>22</sup>

The candidate receives from the DBS their certificate which must be presented to the School as soon as possible after receipt and prior to taking up the post. KCSIE provides the flowchart:



### **Commencement of employment pending a DBS disclosure**

If there is a delay in receiving a DBS disclosure, the Head Master may, under strict controls, allow the person to begin work pending its receipt. In such a case, the School will check the Children's Barred List and any other available checks, such as identity and references, and establish appropriate supervision and a risk assessment (see Appendix 4).

### **Recruitment of ex-offenders**

All positions within the School are exempt from the provisions of the Rehabilitation of Offenders Act 1974. All previous convictions (including those considered 'spent') must be disclosed to the School. Failure to do so may result in summary dismissal on the grounds of gross misconduct, and may also constitute a criminal offence.

If a DBS check identifies a criminal record, the Head Master will make a judgement about the candidate's suitability, taking into account only those offences which may be relevant to the particular job or situation in question, the nature of the appointment, the age of the offence and its frequency. The Head Master will confirm in writing whether the person can be employed and, if so, any mitigating actions and controls to be put in place.

It is unlawful for the School to employ anyone who is barred from working with children. As it is similarly unlawful for such a person to apply for a position within a School, the School will make a report to the police if:

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

If an applicant wishes to dispute any information contained in a disclosure, the applicant can do so by contacting the DBS direct.

### **Prohibition from teaching**

Anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching. Prohibition checks are made through the [Secure access online](#) service (run by the National College for Teaching and Leadership), a database of teachers with QTS that shows any restrictions, prohibition orders, or failure to complete induction or probation year. This is done by entering a name or teacher reference number into the database to ascertain whether any prohibition orders are registered against the individual concerned. This service covers prohibitions across the European Economic Area.

### **Prohibition from management ('section 128 directions')<sup>23</sup>**

Staff appointed to management positions (as defined in the ISI regulatory handbook) must not be prohibited from holding a managerial position in an independent school (i.e. subject to a section 128 direction). The School will check via the [Teacher Services' system](#) that no such directive is in place before confirming the appointment. This applies to appointments from August 2015 and now includes the head teacher, any teaching positions on the senior leadership team, and any teaching positions which carry a department headship. This information is collated on the SCR.

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<sup>23</sup> KCSIE, para 237

### **Overseas checks, if appropriate**

If the applicant has spent a significant time abroad – ISI recommends more than three months, though there is no prescribed time – the DBS may be insufficient. Unless this time relates to a period of time under the age of sixteen, the School will, in such cases, ‘obtain whatever evidence of checking is available from the person’s country of origin (or any other countries in which he or she has lived) and do this before the appointment is made.’

It is important that, even if a candidate has spent little or no time in the UK before, they still receive the DBS vetting.

### **Declaration of mental and physical fitness<sup>24</sup>**

Upon receiving an offer of employment, prospective employees must complete a medical questionnaire (see Appendix 3). The School may legitimately ascertain that the candidate is physically able to carry out the role, and ask the applicant to sign that they ‘know of no reasons, on grounds of mental or physical health, why they should not be able to discharge the responsibility required by the post in question.’ The School may only ask questions that are related to an intrinsic function of the work. The School is bound to make reasonable adjustments for disabled people to be able to undertake employment.

### **Single Central Register of appointments**

The Deputy Head (Academic) will ensure that the correct information is stored on the Single Central Register of appointments (hereafter SCR). The SCR records the following checks for all members of staff at the School:

- identity;
- Barred list/List 99 (date of enhanced DBS check unless a separate earlier barred list check was undertaken);
- professional qualifications (The Teacher Services’ system should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation);
- enhanced disclosure (or DBS Status Check);
- overseas checks, where applicable;
- right to work in the UK;
- prohibition from teaching check;
- prohibition from management check;
- a section 128 check (where applicable);
- completed application form;
- medical fitness declaration.

In the case of older appointments, some evidence may not be available to support the production of a fully complete SCR. Where this is the case, the School will take steps to fill in as many gaps as possible.

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<sup>24</sup> KCSIE, para 213

## SUPPLY STAFF

The School employs teaching, sports and non-teaching staff through supply agencies.

### Confirmation of checks by supply agency

The School must receive written notification (notification only, not copies of documentation) from the supply agency that it has made checks of the following:

- identity;
- Barred list/List 99;
- qualifications;
- overseas checks, where applicable;
- right to work in the UK;
- prohibition from teaching;
- date of written notification that it or another agency has received an enhanced disclosure, and the date of the disclosure;
- date of written notification that it or another agency has received an enhanced disclosure, and the date of the disclosure.

### Identity and DBS check by School

In addition to ascertaining that the supply agency has checked the identity of the person (see list above), the School makes its own check upon arrival. The School must also see a copy of the DBS certificate, which must be less than three months old when the person starts work at the school (unless s/he has been working in a school in the last three months).

### Single Central Register

For supply staff, the School will record the following on the SCR:

- The date the agency made the relevant checks
- identity checks on arrival;
- CV / application form, references;
- medical fitness declaration;
- disqualification from childcare.

## CONTRACTORS

The checks required for contractors depend on whether they are occasional/temporary or long-term/permanent, and again whether the person is in regulated or non-regulated activity.

It should be noted that those on the school site when pupils are not present for example during School holidays, do not require vetting checks.

### 1. Occasional/ temporary contractors

Where contractors are 'not involved in teaching/ training etc. or personal care', for example an emergency plumber, the School has the discretion in law to judge that the person is not in regulated activity and can therefore carry out their work. However, 'if their work gives them opportunity for regular contact with children, KCSIE 2021 stipulates that an enhanced DBS check without barred list information will be required'.

Where checks are not carried out on occasional/temporary contractors, the School adheres to the following procedure:

- the risk assessment is filed and available at the school
- the School explains to the contractor that he must not engage in regulated activity (i.e. unsupervised contact with children);
- the contractor is supervised throughout his time at the School ('schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances').<sup>25</sup>

## **2. Regular/ long-term contractors employed by a third party**

The School employs some regular/ long term contractors employed by a third party who are in regulated activity (i.e. may come into unsupervised contact with children). Examples of people in this category are agency chefs, staff from the Cathedral works department, members of the Cathedral music department, student teachers on placement, the School chaplain and visiting professionals such as the School doctor. Such people need the same checks as School staff (see above, under the heading 'Single Central Register of appointments'). However, these checks should be carried out by the employing organization, with verification by the School of these checks, with the information – including the number of the person's enhanced DBS with barred list status – recorded on the SCR. The School will also check the person's identity upon arrival (i.e. photographic identification such as a passport or driving licence).

## **3. Regular/long-term contractors who are self-employed**

As self-employed contractors cannot vet themselves, the School requires them to be checked by their professional associations. If this is for some reason not feasible, the School will run checks for them (as outlined for School staff above, under the heading 'Single Central Register of appointments').

## **VOLUNTEERS**

Under no circumstances will a volunteer, in respect of whom no safeguarding checks have been undertaken, be left unsupervised with children or allowed to engage in regulated activity.

Prior to engaging a volunteer, the DSL will consider the proposed activities and what, if any, vetting checks are required, in line with the School's policy and statutory law.

It should be noted that family members of School staff (e.g. in the boarding house) do not reside at the School or enter into regulated activity and therefore are not subject to checks.

In line with KCSIE (2021), the school will complete a risk assessment for each volunteer to decide whether they need to do an enhanced DBS check or not.

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<sup>25</sup> KCSIE, paragraph 275

## **VISITING SPEAKERS**

The School is conscious that the School's safeguarding duty extends to the selection of guest speakers. Visiting speakers should not be known to hold extremist views and should be supervised at all times while visiting the School.

The Deputy Head (Pastoral) will ask for a copy of visiting speakers' proposed presentations before they are delivered, and speakers' credentials will always be checked by a member of the SMT before they are invited to the School.

## **GOVERNORS AND TRUSTEES**

Although the recruitment and vetting of Governors is outside the scope of this policy, guidance can be found in the ISI regulatory handbook, paragraphs 247-249 with additional information on page 58. All Governors and Trustees undergo enhanced DBS checks (without barred list checks). Governors and Trustees are never in regulated activity with pupils, with the exception of the Governor for Safeguarding, who has undergone the necessary checks.

## **7. THE DESIGNATED SAFEGUARDING LEAD**

The School's Designated Safeguarding Lead (DSL) is held by the Deputy Head (Pastoral). The DSL is responsible for leading child protection in the School. The key responsibilities are outlined in [KCSIE](#), Annex B.

### **The Designated Safeguarding Lead (DSL)**

The School's DSL will be Emily Auger, Deputy Head Pastoral).

**Email** [eauger@choirschool.com](mailto:eauger@choirschool.com)      **Tel**    079 1957 6710

The Deputy DSLs are:

Nicholas Morrell (Deputy Head Academic & Head of Boarding).

**Email** [nmorrell@choirschool.com](mailto:nmorrell@choirschool.com)      **Tel**    078 8629 4585

Juliet Rodger (Head of Pre-Prep).

**Email** [jrodger@choirschool.com](mailto:jrodger@choirschool.com)      **Tel**    079 0517 8327

### **Role of the DSL & Deputy DSLs**

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.<sup>26</sup>

### **Managing referrals**

The DSL will refer all cases of suspected abuse to the following:

- the LADO;
- other designated officers, such as the Deputy DSLs (where staff at the School are involved);
- the Disclosure and Barring Service (where a staff member is dismissed or leaves the School due to risk/ harm to a child);
- The Police (where a crime may have been committed).

The DSL & Deputy DSLs will liaise with the Head Master to inform him of issues, especially of ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

The DSL & Deputy DSLs will act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

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<sup>26</sup> KCSIE Annex C

The DSL will work closely with any social workers who may be assigned to any pupil, so that decisions can be made in the best interests of the pupil's safety, welfare and educational outcomes. The DSL is also the point of contact for the three safeguarding partners (the local authority; a clinical commissioning group within the local authority; and the police).

### **Training**

The DSL and the Deputy DSLs should receive updated child protection training every two years in order to do the following:

- understand the assessment process for providing early help and intervention;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understand the School's safeguarding and child protection policy and procedures, especially when inducting new and part time staff;
- be alert to the specific needs of children in need, those with SEN and young carers;
- be able to keep detailed, accurate, secure written records of concerns and referrals;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings.

The DSL and Deputy DSLs will complete the online Channel General Awareness module and receive available training from the City of Westminster Prevent team to develop an awareness of the particular local situation regarding radicalisation.

### **Raising awareness**

The DSL should ensure the School's policies are known and used appropriately. The DSL will do the following:

- ensure, with Governors, that the School's safeguarding and child protection policy is reviewed annually, that the procedures and implementation are updated and reviewed regularly;
- ensure that the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- provide a link with the LADO to make sure staff are aware of training opportunities and the latest policies on safeguarding;
- where children leave the School, provide their new school with their child protection file as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

### **Transfer of School records and information sharing**

In accordance with KCSIE (Annex C), it is the responsibility of the DSL, where children leave the school or college, to, 'ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.' The file should be shared between DSL and/or Head Teachers following telephone contact, and never via third parties, including parents or carers. Evidence of the file transfer should be kept, including confirmation of receipt. File transfer can be by hand, by recorded delivery to the appropriate named individual or by secure



electronic means. If by recorded delivery, the DSL will phone ahead to notify the receiving party, and the file will be marked 'Strictly Confidential' and for attention of the named DSL only. The receiving DSL should confirm receipt in writing.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. This would include information which would allow the new school to continue to support victims of abuse and have that support in place for when the child arrives.

The School has regard to the Government's guidance in [Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (March 2015). This includes the 'seven golden rules to sharing information'.

### **Alternative provision**

Alternative provision is education outside school, arranged by local authorities or schools, for pupils who do not attend school for reasons such as school exclusion, behaviour issues, school refusal, or short- or long-term illness.

The DSL will obtain a written statement from any alternative provision stating that they have completed all the vetting and barring checks that are necessary on their staff.

## 8. SAFEGUARDING AND CHILD PROTECTION TRAINING

All adults working at the School who may be in regulated activity with children receive annual safeguarding and child protection training in accordance with advice received from the LSCB. This includes staff, relevant Governors, coaches, temporary staff and volunteers. This should enable them to recognise the possible signs of abuse, neglect and radicalisation and to know what to do if they have a concern. In addition to annual training, staff also receive updates (e.g. through email or staff meetings) when new statutory guidance documents or other useful sources of safeguarding guidance are published.

Training includes:

- reading this policy;
- reading the staff code of conduct contained in this policy;
- being informed of the identity of the DSL and the Deputy DSLs and procedures for informing for of concerns;
- online safety and SEND considerations
- the School's procedures for managing children who are missing education
- the School's pupil behavior policy
- receipt and reading of [part one of KCSIE](#)
- receipt and reading of [what to do if you're worried a child is being abused](#).

Staff will complete an assessment to ensure that they understand the key information about safeguarding at the School.

All permanent staff will be issued with Part 1 of KCSIE, whenever it is updated by the DfE and reminded of their obligation to read it. At the end of their training, staff will sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents (see Appendix 5).

Temporary staff receive a one-to-one briefing with the School's DSL about the School's safeguarding policy.

The DSL and Deputy DSLs will also attend conferences and training days to develop their competence in safeguarding and child protection.

A record on the SCR will be kept of attendees at INSET and of further courses attended.

All staff who work with children are given Annex A of *KCSIE* as part of their induction training.

## 9. OTHER SAFEGUARDING AND WELFARE RESPONSIBILITIES

The School has other significant safeguarding and welfare responsibilities. These include the following:

- health and safety – risk assessment of onsite and offsite activities;
- photography and images;
- safeguarding education;
- bullying;
- e-safety;
- secure premises;
- boarding.

### **Health and safety: risk assessment of onsite and offsite activities**

The School has a legal duty of care to ensure that its staff and boys are safe whether at school or engaged in some other School-related activity. Full details are contained in the School's health and safety policy and educational visits policy.

Where boys are on-site or engaged in activities organised by the School, the School's safeguarding and child protection policy and procedures apply.

Where other organisations provide services or activities, the member of the School's staff responsible for arranging the services will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

### **Missing child**

The School's lost child policy applies if a child goes missing while in the School's care, and is in the Staff Handbook and available from the School Office.

### **Attendance**

The School will report certain attendance issues to the LADO: ten days of unauthorized absence (other than for reasons of sickness or leave of absence); failure to attend regularly, and deletion from the school register when the next school is not known. The School is aware that 'a child going missing can act as a vital warning sign of a range of safeguarding possibilities'<sup>27</sup> Where a boy is repeatedly absent from School, his welfare should be carefully considered, specifically whether there are any signs of abuse, neglect or radicalisation. Further important guidance on the possible issues behind pupils missing from school is contained in Annex A of KCSIE. The School should also have regard to [Children missing education: statutory guidance for local authorities](#) and the government's [missing children and adults strategy](#).

### **Deleting a boy's name from the register**

The School has regard to KCSIE and the Data Protection Policy when deleting a boy's name from the register and will promptly notify the Local Authority in the required circumstances.

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<sup>27</sup> KCSIE para. 164

### **Photography and images**

Full details are contained in the staff code of conduct and the taking, storing and using images of children policy which is in the Staff Handbook and available from the School Office.

### **Safeguarding education**

In addition to training its staff, the School also recognises its duty to educate its boys in safeguarding. This is done through various means, including whole-School assemblies, the ICT code of conduct, through the information ('If Something Worries You') contained in the School prep diary and through PSHCE. Safeguarding education includes teaching the dangers of radicalisation.

### **Bullying**

The School recognises the importance of constant vigilance with regard to bullying. Full details are contained in the anti-bullying policy.

### **Online safety**

The School does not allow boys to bring internet enabled devices to School; phones brought into School by boys travelling without their parents must be deposited with the Deputy Head (Pastoral) during the School day. However, the School recognises its responsibility to promote e-safety and prevent cyberbullying and radicalisation. The School organises cyberbullying workshops and seminars for boys and parents and keeping safe online is discussed and taught in assemblies and PSHCE; the DSL has overall responsibility for this. Any incidents of cyberbullying will be dealt with according to the School's anti-bullying policy. For further details also see the School's ICT Code of Conduct (for parents and boys) and the staff ICT policy. In addition to the government's advice on [Teaching online safety in school](#), the School has regard to [The use of social media for online radicalisation](#) and employs filters to ensure that extremist sites are not accessible to pupils, while not 'overblocking' so that pupils would be unable to learn about safeguarding. Further guidance is given in KCSIE, Annex C.

### **Secure premises**

The School will take all practicable steps to ensure that School premises are as secure as circumstances permit. For full details see the School's policy: registering visitors, school security & reporting a security concern.

### **Boarding**

The School has a particular duty to safeguard children who board and observes the requirements of the National Minimum Standards for Boarding Schools. It also provides regular INSET for boarding staff, including extra safeguarding training, and ensures that staff receive training on pastoral care from the Boarding Schools Association. The boarding team holds weekly pastoral meetings of which detailed minutes are taken. Boarders know that they have a range of people who they can talk to if they are concerned about something, including an independent listener. Abuse can occur between an adult and a boarder or peer to peer. Staff are alert to the vital importance of monitoring relationships within the boarding house, both between adults and boarders and between boarders. Lay-clerks (adult choristers) are never in unsupervised contact with boarders and all lay-clerks receive annual safeguarding training with the DSL. Lay-clerks are always accommodated separately on choir tours or trips.

**Cathedral staff**

Cathedral staff whom the school knows have been checked for their suitability to work with children are allowed unsupervised on the school premises where their duties require this and at the invitation of school staff (for example to attend the weekly meeting with the DSL, Headmaster and Head of Boarding).

Access by other Cathedral staff and visitors not known to the school is not permitted unless by prior arrangement, following the same checks that are applied to visitors and with full-time supervision from school staff.

**Emergency contacts**

Where reasonably possible, the School holds more than one emergency contact number for each pupil. This information is held in accordance with the Data Protection Policy and is available to all staff on the internal network server.

**Homestays for trips overseas**

It is not possible for schools to obtain criminality information from the DBS about adults who provide homestays abroad. When the need for homestays arises, for example on a choir tour abroad involving boarders from the School, the DSL will liaise with partner schools and/or institutions abroad, to establish a shared understanding of, and agreement to the arrangements in place for the visit.

The DSL will exercise professional judgement to ensure that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Chorister parents will be made aware of the agreed arrangement. The DSL will also decide whether they consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible.

During the visit, choristers will be briefed so that they understand who to contact during a homestay should an emergency occur or a situation arise which makes them feel uncomfortable.

**APPENDIX 1**
**APPLICATION FORM**
**Position applied for .....** **Date.....**

1. Personal details	
Surname	Forenames
Title	DfE ref no
	National insurance no
Address	Tel (home)
Post code	Tel (mobile)
Email	

2. Education University / College	From	To	Qualification (including degree class)
Secondary education School(s) / College (s)	From	To	A Levels (including grades)

3. Current employer				
Employer's name and address	Position	Start date	Current salary	Why do you wish to leave?

<b>4. Employment history</b>					
Employer's name & address (most recent first)	Position held	Start date	End date	Salary on leaving	Reason for leaving
<p><i>Please continue on a blank sheet if you require more space</i></p>					

<b>5. Additional information</b>
<p>1. Do you suffer from a disability as described by the Disability Discrimination Act? If YES, please provide details.</p> <p>2. Do you require any special arrangements to be made if you are short-listed for interview? If YES, please provide details.</p> <p>3. Do you have any family or any close relationships with employers or employees, including governors at Westminster Cathedral Choir School? If YES, please provide details.</p> <p>4. Have you lived in a country other than the UK for a period of three months or more since the age of 18? If YES, please provide details below (with places and dates)</p>

### 6. Referees

We require the details of two referees, unrelated, one of whom should be your current or most recent employer, and the Head in the case of a school. The School reserves the right to ask for a reference from any previous employer.

May we contact referees prior to interview? Yes/No

Name	Name
Address	Address
Tel	Tel
Email	Email
How long have you known this referee and in what capacity?	How long have you known this referee and in what capacity?

### 7. Criminal Convictions – Rehabilitation of Offenders Act 1974

Westminster Cathedral Choir School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment. The School's Safeguarding and Child Protection policy can be downloaded from [www.choirschool.com](http://www.choirschool.com) or on request from the School's office.

All applicants who are offered employment in posts involving access to children (whether teaching or support) will be subject to a criminal record check from the Disclosure and Barring Service (DBS) before the appointment is confirmed. This will include details of cautions, reprimands or final warnings, as well as convictions. This means that you are required to declare any convictions or cautions that you may have, even if they would otherwise be regarded as 'spent' under this Act, and any cautions or bind-overs and any prosecutions pending against you. Failure to disclose this information could result in disciplinary action or dismissal.

Any information will be treated in complete confidence.

Details of any convictions or cautions should be provided in a sealed envelope addressed to the Head Master, marked CONFIDENTIAL and enclosed with this application.



**7. Declaration and signature**

I agree that any offer of employment by Westminster Cathedral Choir School is subject to satisfactory evidence of the right to work in the UK, satisfactory references and medical and police clearance (where appropriate).

In accordance with the General Data Protection Regulations 2018, it is agreed that Westminster Cathedral Choir School may hold and use personal information about me for personal reasons and to enable the school to keep in touch with me. This information can be stored in both manual or computer form. Information on how the school will use this information is detailed in the School Privacy Notice, a copy of which is available on the school website.

I confirm that the information given in this application and any attachments is factually correct and complete and I understand that any false information may, in the event of employment, result in disciplinary action or dismissal, or referral to the Teachers Misconduct Team (DfE), DBS or the Police, if appropriate.

I have read the notes on Criminal Convictions and agree to an enhanced Disclosure Check of Police Records being made if I am offered the job for which I am applying.

I understand that the job for which I am applying is covered under the Rehabilitation of Offenders Act 1974 (Exceptions Order 1975) and, consequently, no criminal conviction may be considered 'spent'.

I confirm by ticking the appropriate box that:

I do not have any criminal convictions or cautions.	<input type="checkbox"/>
I am not on List 99 or disqualified from working with children, including under the Childcare Act 2006.	<input type="checkbox"/>
I am not subject to sanctions imposed by a regulatory body, e.g. the General Teaching Council (GTC).	<input type="checkbox"/>
I am not subject to a Prohibition Order from the Secretary of State.	<input type="checkbox"/>

*Please provide details if you have not ticked one (or more) of the boxes.*

Signed

Date

**APPENDIX 2**
**CONFIDENTIAL REFERENCE REQUEST**
**CANDIDATE:**
**POST APPLIED FOR:**

This reference request form is part of our safer recruitment procedure. Please complete this form in full. If you wish to add a conventional narrative reference, please do.

<b>BACKGROUND</b>	
How long have you known the candidate and in what capacity?	
<b>PERSONNEL MATTERS</b>	
Dates of the candidate's employment with you (month and year)	From:  To:
Candidate's duties and responsibilities	
Have there been any competence, capability or disciplinary issues or other concerns? Please include details of any sanctions that have expired.	
Approximately how many days was the candidate absent from work during the last two years of employment with you?	
Do you believe that the candidate is physically and mentally fit to work in a school environment? If not, please elaborate, including any adjustments which have been made to enable the candidate to perform his or her duties.	
<b>For previous employers only:</b> Why did this candidate leave your employment?	
<b>For the current employer only:</b> Current salary and details of post (please attach a job description, if available)	
<b>SUITABILITY FOR POST</b>	
Please indicate the candidate's strengths and weaknesses, particularly in the classroom,	

and in his/her contribution to the corporate life of the School.					
Do you believe that the candidate is suitable for this position? Please comment on motivation as well as abilities.					
Would you re-employ the candidate? If not, please explain why.					
<b>Please rate the candidate against the following criteria</b>	<b>Needs substantial development</b>	<b>Needs development</b>	<b>Acceptable</b>	<b>Strong</b>	<b>Outstanding</b>
Ability to keep to deadlines					
Assessment and marking					
Attendance					
Attitude to work					
Classroom management					
Commitment to school events					
Extra-curricular involvement					
Planning and preparation for lessons					
Reliability					
Professional relationships with pupils					
Professional relationships with colleagues					
Professional relationships with parents					
<b>SUITABILITY TO WORK WITH CHILDREN AND DISCIPLINARY RECORD</b>					
Are there any reasons why the candidate should not have access to children? Please include any allegations or concerns that have been raised about the					

applicant that relate to the safety and welfare of children, and the outcome of these concerns. Please include all disciplinary offences related to children, even if 'time expired'.	
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**Referee's contact details**

Name		Position	
Address			
Daytime telephone number		Signature	
Evening telephone number		Date	

Please kindly return this form to Mr Neil McLaughlan, Head Master, Westminster Cathedral Choir School, Ambrosden Avenue, London SW1P 1QH

**Email** [office@choirschool.com](mailto:office@choirschool.com)

**Fax** 020 7630 7209

**APPENDIX 3**
**PRE-EMPLOYMENT HEALTH QUESTIONNAIRE**
**STRICTLY CONFIDENTIAL**

This questionnaire should be completed as fully as possible in capital letters.

The information will be treated in confidence (between the School and its doctor).

**Identity and contact information**

Forename		Title (Dr, Mr, Mrs, Miss, Ms)	
Surname		Date of birth	
Address		Name and address of GP	
Position applied for			

**Medical**
**history**

Please complete the following questions by ticking the appropriate box. If the answer is 'yes', give details including (a) date, (b) amount of time lost from work/school (if any), treatment (if any).

<b>Have you ever suffered from any of the following illnesses?</b>			
	<b>Yes</b>	<b>No</b>	<b>If yes, please give details</b>
Visual defects/ eye conditions (including colour blindness)			
Hearing defects/ ear conditions			
Severe anxiety, depression, other psychiatric disorder			
Paralysis or other neurological disorder			
Fainting attacks, blackouts, epilepsy or fits			
Recurrent headaches, migraine			
Vertigo, giddiness or tinnitus			
Heart disease, high blood pressure			
Asthma, bronchitis, tuberculosis or other chest disease			
Liver disorder			
Kidney or bladder problems			
Recurrent backache, arthritis, rheumatism			
Any blood disorder			
Eczema, dermatitis, other skin conditions			
Diabetes, thyroid or other gland problems			
Hay fever, allergies to drugs, animals etc.			
Any recurrent infections			
Any impairment of immunity to infection			
Hernia			
Any alcohol or drug related problems or illness			
Any other medical condition, physical or mental, not mentioned above			
<b>Have you?</b>			

	Yes	No	If yes, please give details
Ever undergone a surgical operation or been admitted to hospital for any reason?			
Had more than 20 days' sickness absence in the past two years?			
Ever been, or are, a Registered Disabled Person?			
<b>Present health status</b>			
	Yes	No	If yes, please give details
Are you at present taking any medication prescribed by a doctor?			
Are you at present receiving any treatment prescribed by a doctor?			
Do you have any physical disability necessitating special aids, or requirement for access to premises?			
Do you have any other relevant health problems?			

**Declaration**

- I declare that, to the best of my knowledge, the information I have given is correct and that I know of no reasons, on grounds of mental or physical health, why I should not be able to discharge the responsibilities required by the post in question.
- I understand that the School is legally required to verify my medical fitness for the role, that my employment with the School is therefore conditional upon the verification of my medical fitness and that I may be required to attend a medical examination.
- I understand that failure to disclose relevant information or giving false information may result in termination of my employment or the withdrawal of an offer of employment.
- I consent to the School retaining this medical form and any other information about my medical fitness on my confidential personnel file for the duration of my employment. I understand and agree that the School may use any medical information about me to help discharge its obligations towards me as my employer as and when it is necessary, or reasonable, to do so. I further understand and agree that the School may confidentially retain any medical information about me for a period of six months after my employment terminates, following which it will be securely destroyed.
- I hereby give my consent to Westminster Cathedral Choir School processing the data supplied above.

**Signature**..... **Date** .....

**To be completed by the School in consultation with the School doctor as needed:**

Fit for employment specified:

Detail of any adjustments to be considered:

Name:

Signature:

Date:

**APPENDIX 4**
**RISK ASSESSMENT FOR EMPLOYMENT PENDING DBS DISCLOSURE**

Assessment carried out by:.....(DSL) Assessment date:.....

**NB: No person without the correct clearance will be allowed to engage in regulated activity at WCCS.**

<b>Name</b>		<b>Job title</b>	
<b>Expected date of commencement:</b>		<b>Details of any previous DBS checks:</b>	
<b>Date DBS check requested:</b>		<b>Photographic ID / proof of address seen:</b>	
<b>Two satisfactory references seen:</b>		<b>Application form received / gaps in work history fully explored: N/A</b>	
<b>Barred list check carried out:</b>		<b>Additional relevant information</b>	

**Level of risk**  
 The employee has not yet received his/ her DBS disclosure and therefore may be unsuitable to work with children. What level of risk does the School estimate the employee may pose?

<b>Low</b>	<b>Medium</b>	<b>High</b>



**Management of risk**

If the Head Master judges that it is reasonable for the employee to begin work at the School, what measures will be taken to manage risk?

Measure	Yes (if applicable)
Supervision by a current and fully-checked member of staff	
The above-named will not be in regulated activity with children (i.e. unsupervised access)	
The above-named has read, understood and agreed to adhere to the School's Safeguarding and Child Protection Policy, including the code of conduct for staff	
The arrangements established by the School will be reviewed by the DSL on a fortnightly basis until the submission of a valid DBS certificate	
Any additional measures should be noted here:	

**APPENDIX 5**
**CONFIRMATION OF RECEIPT OF SAFEGUARDING POLICIES AND TRAINING**

Name: .....  Date of joining school: ...../...../.....  Date of induction (or of annual renewal): ...../...../.....  Name and designation of staff member responsible for induction:.....
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Declaration	Tick
I confirm that I have received, read and understand the School’s Safeguarding and Child Protection Policy, including the procedure for reporting concerns about a child, the code of conduct for staff and the whistleblowing procedures.	
I confirm that I have read and understand part one of <i>Keeping Children Safe in Education</i> , including <i>Annex A</i> .	
I confirm that I have read and understood the pupil behavior policy.	
I can confirm that I have read and understood <i>What to do if you’re worried a child is being abused</i> .	
I confirm that I have been made aware of my duty to safeguard and promote children’s welfare and how to manage a report of peer on peer abuse / sexual harassment.	
I confirm that I know the identity of the Designated Safeguarding Lead (DSL) and deputy DSLs and how to contact them.	

Signature: .....  Date: ...../...../.....  <i>Please sign and return this form to the Designated Safeguarding Lead:</i>  DSL signature: .....  Date: ...../...../.....
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**THIS FORM MUST BE RETURNED BY THE DSL TO THE HEAD MASTER’S PA AND KEPT ON RECORD.**

## COVID-19 ADDENDUM

This Covid-19 Addendum outlines how we plan to safeguard the boys during any period of remote learning.

### **Risk Assessment for re-opening the School in September 2020**

A COVID Reopening risk assessment for Prep and Pre-Prep has been written and published on the School website. Guides on operating procedures and Q and As have also been sent to all parent and staff. These are also published on the School website.

### **Safeguarding Risk Register**

The safeguarding risk register (below) considers the risks posed by remote learning and COVID-19, and how the School will best mitigate these risks if we had to return to a remote programme.

Risk	Mitigation measures	Action	Person responsible
Risk of access by adults to children (eg volunteers) bypassing normal safer recruitment policies and procedures	<p>No new staff should need to join during any remote period</p> <p>Any new staff being appointed go through normal safer recruitment procedures before starting</p> <p>School not currently running clubs on <i>Google Classroom</i>.</p>	<p>EA runs safeguarding training for all staff and latest training done remotely during Michaelmas INSET. Club providers receive training additionally.</p> <p>LA has still confirmed all checks with those running external clubs (i.e. chess and coding)</p>	EA
Risk of lack of access to statutory child protection services	<p>School has access to following Local Authority workers during remote period</p> <p>Hilary Shaw: Senior Inclusion Officer   078 1736 5519   <a href="mailto:hilary.shaw@rbkc.gov.uk">hilary.shaw@rbkc.gov.uk</a></p> <p>Aqualma Daniel: LADO (Local Authority Designated Officer)   07870 481 712 <a href="mailto:adaniel@westminster.gov.uk">adaniel@westminster.gov.uk</a></p> <p>Kembra Healy, Srqa Manager Quality, Quality Assurance and Safeguarding, WCC and RBKC   075 2221 7314   <a href="mailto:kembra.healy@rbkc.gov.uk">kembra.healy@rbkc.gov.uk</a></p>	None at present	EA

Risk	Mitigation measures	Action	Person responsible
Risk of child sexual abuse through the virtual learning environment	<p>Remote safeguarding training was a compulsory session for all academic and music staff during INSET on 14th April 2020 which discussed running online lessons safely</p> <p>During remote learning, 1:1 sessions will take place, but only on <i>Google Classroom</i> and contact with children is from 8.00 am – 5.00 pm. 1:1 sessions include music and reading in Pre-Prep. Parents aware of all online sessions sons are involved in.</p>	Form time in early weeks directed at being safe online and time allocated for boys to discuss concerns	EA & Form Tutors
Risk of online peer on peer abuse through the absence of normal face to face contact and heightened use of social media	<p>Form Tutors aware of issues within forms already and pastoral registers completed by all Form Tutors from Reception – Year 8 before start of term</p> <p>Parents asked to observe what children write online</p>	<p>Form time in early weeks directed at children’s safety and the need to talk to adult if unkind comments are made</p> <p>During remote learning, Form Tutors to send one weekly private message through <i>Google Classroom</i> to tutees to monitor welfare</p> <p>Staff to be mindful of pupil relationships during remote learning.</p>	EA/JR/Form Tutors

Risk	Mitigation measures	Action	Person responsible
<p>Risk of neglect of children where parents are too ill, anxious, or too burdened with work to be able to care for them</p>	<p>Be aware of which families are under particular pressures</p> <p>Discuss with Form Tutors privately, if necessary</p> <p>During remote learning boys in Years 4 – 8 are registered every morning during form time; Reception – Year 3 are registered during form time in the afternoon. Absences are chased up by the Form Tutor</p> <p>‘Vulnerable children’ are also know to SMT and, where applicable, Form Tutors – their well-being closely monitored</p>	<p>Tutors to be given this information on 1:1 basis</p> <p>Attendance to lessons is also monitored by class teachers</p>	<p>EA/JR</p>
<p>Risk of children not having access to usual pastoral and welfare support within the organisation and increased barriers to children reporting concerns to responsible adults</p>	<p>During remote learning, need for 1:1 support during form time and at the end of every live lesson – offered <i>at least</i> once per week and advertised in newsletters in first half of term</p> <p>Need for Neema, School Counsellor, to be available for drop-ins</p>	<p>During remote learning, Neema running weekly sessions over the phone</p> <p>Tutors to be asked to make 1:1 contact every week</p> <p>Staff meetings taking place to discuss pastoral well-being</p>	<p>EA/Form Tutors</p>

<b>Risk</b>	<b>Mitigation measures</b>	<b>Action</b>	<b>Person responsible</b>
Risk of staff members not having access to Designated Safeguarding Leads, or not reporting concerns	EA/NM and JR's contact details known by all staff and sent round in Michaelmas safeguarding training	Staff meetings every week in Prep and Pre-Prep allow for pastoral/safeguarding concerns to be raised	EA/JR
Risk of staff not passing on safeguarding concerns, particularly when boys begin to return after 1st June	Covered in safeguarding training in September 2020. Staff familiar with roles and responsibilities.	JR to monitor safeguarding concerns in Pre-Prep and EA in Prep  Part of staff meeting to discuss well-being of returning boys	EA/JR/NM
Risk of distress or anxiety related to health or welfare of family members or friends as a result of coronavirus	Parents will email School if this has been an issue  Discussed at INSET' with all staff under pastoral training	EA to pick up with specific Form Tutors if necessary	

Risk	Mitigation measures	Action	Person responsible
Risk of anxiety, stress or to mental health posed by isolation, excessive screen time, worries around academic work, exam or qualifications, or simply by exposure to worsening news reports	<p>During remote learning, parents and Form Tutors to liaise if this becomes an issue</p> <p>Screen time balanced with quiet reading and sport allocated in afternoon</p> <p>Live form time every morning, Monday – Friday where Form Tutors can monitor well-being</p> <p>Tutors to keep boys’ well-being under close observation during 1:1 messages through <i>Google Classroom</i></p>	<p>Staff well-being also needs to be monitored and is on SMT weekly agenda</p> <p>Groups have been set up for staff run by Heads of Houses</p>	Form Tutors
Risk of abuse or stigmatisation on the basis of infection, race or nationality	Discussed at INSET during pastoral session – given pandemic is now global, feeling was this is less likely	<p>Discussion at form times with boys and monitor</p> <p>Need for everyone to feel part of a group during form time – form games used to create this</p>	Form tutors
Risk of wider culture slippage posed by the move to the virtual environment.	Importance of usual boundaries with boys and parents stressed at INSET	<p>Monitor closely</p> <p>Safeguarding to remain on SMT agendas</p> <p>During remote learning, NMo and NMCL can drop in on all live sessions on <i>Google Classroom</i></p>	SMT