



GSL – Safeguarding Policy

Policy Reference	GSL/POL/023/4
Last Updated	January 2025
Next Review	September 2025

INTRODUCTION

GSL Education is an established Teacher and Support Staff agency, working with a wide variety of schools ranging from Primary, Secondary, Special Needs, State and Independent schools right across the country. We are dedicated to providing the highest standards, especially with regards to Child Protection and Safeguarding. Although we are not an educating body ourselves; in our role of supplying staff to schools, we take our responsibility seriously in ensuring that our candidates are rigorously vetted in order to prevent people who pose a risk of harm from working with children and vulnerable people. We also work to ensure that all staff and candidates are clear on what steps should be taken if a concern is identified or a referral is made.

As set out in Keeping Children Safe in Education 2024 (KCSIE), for the purposes of this policy, safeguarding and promoting the welfare of children is defined as:

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

We understand that safeguarding is everyone’s responsibility and that team-work involving effective information sharing between all those connected (staff, candidates, school teams, parents, families, local authorities, police and the students themselves) is the key to safer communities.

The best interests of children are always the priority, all children have a right to be heard and an equal right to protection.

This concept is communicated to all our candidates, and we expect them to maintain vigilance, awareness and an attitude of 'it could happen anywhere' with regards to safeguarding. When working in partnership with schools and education providers they must align their practice with the policies and procedures of each setting (including Child Protection, Behaviour, Staff Behaviour and Safeguarding Policies). They must record and report all concerns in accordance with these policies and procedures, as well as to their dedicated consultant, who will liaise with GSLs Designated Safeguarding Officer.

Our own supply rules and codes of conduct reinforce expected behaviour including the responsibility to promote an ethos and environment which helps children to feel safe, be safe, feel respected and confident to talk openly about concerns.

Our safeguarding processes are in line with Government legislation, DfE and local authority guidance including:

- Keeping Children Safe in Education (reviewed annually in September)
- The Children Act 1989 "Working Together Under the Children Act 1989"
- Working together to Safeguard Children 2023
- The Children Act 2004
- Guidance for safer working practice for those working with children and young people in education settings – 2019 (Safer Recruitment Consortium)
- Rehabilitation of Offenders Act 1974
- Disqualification under the Childcare Act 2006 – Updated in 2018 (Department for Education)
- Counter Terrorism and Security Act 2015 (including the 'Prevent Duty')
- The Prevent Duty, Departmental, Advice for Schools and Child Care Providers - 2015 (Department for Education).
- Modern Slavery Act 2015
- Human Rights Act 1998
- Ofsted: Education Inspection Framework
- Early Years and Foundation Stage Framework
- Framework for the Assessment of Children in Need and their Families
- Local Authority Safeguarding Children Procedures
- Our auditors - [REC's](#) (Recruitment and Employment Confederation) and [Crown Commercial Service](#) (CCS) guidelines.

Related Policies:

- Safeguarding Statement
- Safer Recruitment Policy
- Policy Statement for Candidates who become unsuitable
- Continued Suitability Policy
- Recruitment, Selection and Vetting Policy
- Vetting Policy
- Equal Opportunities and Diversity Policy
- Complaints Policy and Procedure
- Whistleblowing Policy
- Health and Safety Policy
- Supply Rules
- Adult Behaviour Code
- Social Media Policy

As a result of the Covid-19 pandemic some may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. Our candidates are also aware of this in their work with schools, especially when working to support via face-to-face onsite/off-site, online tutoring.

We have our own Designated Safeguarding Officer who manages and monitors our policies, procedures, practice and training; and provides advice and guidance where needed.

Our policies are reviewed at least annually and in response to any changing government, national or local guidance, learning outcomes from our own internal safeguarding board level reviews, feedback from our partner schools, or recommendations from our external auditors.

SCOPE

This policy details the processes and practices undertaken by GSL Education to ensure that all candidates are recruited following Safer Recruitment practice, that their continued suitability and compliance is monitored and maintained, and that all staff and candidates maintain an up-to-date knowledge and understanding of Child protection and Safeguarding.

The policy identifies the key policies and procedures followed, and provides information on how to respond when concerns are raised, or referrals are made.

POLICY AIM

The aim of this policy is to provide accurate information and guidance on the steps we take to apply safer recruitment practice and to ensure that staff and candidates maintain an up-to-date knowledge of Safeguarding and Child Protection, and their responsibilities to be vigilant and to respond appropriately to concerns that may be raised.

Our Safeguarding and Child Protection Team

Director with responsibility for Safeguarding and Child Protection:

Steve Bryce

Email: steve.bryce@gsleducation.com

Designated Safeguarding Officer:

Sarah Andrews

Email: sarah.andrews@gsleducation.com Or safeguarding@gsleducation.com

Tel: 0203 8730 565

Local Safeguarding Contacts:

See below for the weblinks for your Local Authority Safeguarding contacts

Bournemouth: [BCP Council Children young people and families LADO service](#)

Chelmsford: [Essex Schools InfoLink Pupil Support and Welfare](#)

Hull: [Hull Safeguarding Children's Partnership](#)

Kent: [KELSI Safeguarding Contacts](#)

Leicester: [Leicestershire Safeguarding Children Partnership](#)

London: [Hackney Safeguarding Education](#)

Lincoln: [Lincolnshire Safeguarding Children Partnership](#)

Manchester: [Manchester Safeguarding Children Partnership](#)

Newcastle: [Newcastle Safeguarding Children Board](#)

Plymouth: [Plymouth Safeguarding Children Partnership](#)

Southampton: [Safeguarding children – Southampton LADO](#)

South Yorkshire (Sheffield): [Sheffield Children Safeguarding Partnership](#)

Watford: [Hertfordshire Safeguarding Children Partnership](#)

Branch Managers (Trained in Safer Recruitment, Safeguarding and Child Protection)

Central Solutions:

Genevieve Currie

Email: genevieve.currie@gsleducation.com

Tel: 01752 429 845

Chelmsford:

Katie Gibson

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Tel: 01245 203 218

Dorset:

Elliott Dawson

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Hampshire SEN:

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Alom Ahmed

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Newcastle:

Sarah Elliott

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Tel: 0191 933 7888

South Yorkshire:

Mitch Stringer

Email: mitch.stringer@gsleducation.com

Tel: 0114 399 3815

Watford:

Moynul Islam

Email: moynul.islam@gsleducation.com

Tel: 01923 954070

(See website www.gsleducation.com/cm/contact-us)

Education Consultants (First Point of Contact for Candidates and Clients)

All our education consultants are trained in Safer Recruitment practice and managing allegations, annually. They also attend a weekly meeting which includes a Safeguarding Update section delivered by our DSO.

(See website www.gsleducation.com/cm/about-gsl/gsl-family)

Safer Recruitment, Safeguarding and Child Protection Processes

Every stage of or recruitment process is designed to ensure that every reasonable action is taken to ensure that all candidates are safe and suitable to work with children in schools, referral units, tutoring off-site and tutoring via remote systems.

These processes include:

- 2 stage recruitment includes face-to-face interview and rigorous background screening checks
- Ongoing monitoring and regular updated screening checks for continued suitability and quality assurance
- Training and information sharing around Safeguarding and Child Protection
- Clear governance and reporting system for referrals

Recruitment and Vetting Checks

As detailed in our 'Safeguarding Statement', 'Vetting Policy' and 'Registration and Vetting Procedure' and related policy statements; all candidates must satisfactorily complete our rigorous recruitment process. This comprises of pre-screen checks, a face-to-face interview (either in person or via video call if appropriate), and full vetting checks.

Since the addition to KCSIE Part 3 around online checks, we have created a 'Social Media Policy', which is thoroughly discussed with all candidates during registration. This provides clear advice, guidance and expectations around candidates use and management of social media and online activity. These expectations are reinforced in our 'Supply Rules' (Code of Conduct for Supply Staff).

"In addition, as part of the shortlisting process schools and colleges **should consider** carrying out an online search as part of their due diligence on the shortlisted candidates." (KCSIE 2024, Part 3, Paragraph 226)

GSL Education have carefully considered the benefits and risks associated with such searches. We will therefore, only conduct an online search (with the candidates consent), if we have reason to believe that this is necessary due to information received about concerning attitudes or activities that may be displayed using online platforms. This will be conducted at point of interview, or at any time thereafter, whilst a candidate is registered with us, and concerns are raised.

All evidence and documentation relating to our safer recruitment process is stored securely on our CRM. Systems are in place to ensure that updated checks are carried out, at the required intervals, so that candidates remain compliant.

Clear procedures are in place to ensure that candidates who become unsuitable are identified, investigated, and reported as appropriate.

Knowledge of Safeguarding and Child Protection

There are 4 categories of abuse recognised by the 1989 Children Act: Physical Abuse, Sexual Abuse, Emotional Abuse and Neglect. Full information about the types of abuse, neglect and exploitation can be found in Appendix 1.

All those working in education are required to read and understand Part 1 of “Keeping Children Safe in Education”, which is updated annually in September. GSL staff and all candidates are expected to sign a declaration to confirm that they have done this. We also provide links to Prevent and Channel Awareness training and securely store copies of all relevant safeguarding training certificates.

Specific questions are included in our interview process to assess candidates’ understanding of the content.

Specifically adapted questions are used for tutors to ensure that they understand and have the skills to adapt their practice when working with individuals and small groups, in-person onsite or off-site as well as remotely using online resources.

Our GSL staff are trained in Safer Recruitment, Safeguarding and Child Protection on induction and annually.

Section 47 of the Children Act 1989 states that a local authority has a duty to investigate when there is “reasonable cause to suspect that a child who lives, or is found, in their area as suffering, or is likely to suffer, significant harm”. It must make such enquiries as it considers necessary in order to decide whether any action is needed to safeguard or promote the child’s welfare.

Section 47(9) says that “Where a local authority are conducting enquiries under this section, it shall be the duty of any person....to assist them with these enquiries.....if called upon by the local authority to do so”.

Our candidates, due to their roles in schools, are well placed to observe signs and symptoms of abuse, neglect or exploitation. We make it clear that it is their responsibility to report suspected or alleged abuse, by following the school’s Safeguarding and Child Protection Policies and Procedures. All candidates should be aware that any child may benefit from ‘Early Help’ and that they should be alert to the potential need for early help for all children, but particularly those with relevant factors as listed in Appendix 2.

We emphasise that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being abused; each category of abuse, neglect and exploitation are rarely found in isolation and are often interlinked. All concerns should be taken seriously and will be investigated on a case-by-case basis.

Children may report abuse happening to themselves, their peers or their family members. All reports made by children will be taken seriously and will be responded to in line with this policy and in partnership with school safeguarding teams.

If a candidate is working outside of the school environment (for example home/remote tuition) it is his/her duty to report any concerns to the local LADO. If a candidate has reason to believe that a young person is at risk of harm, then the safety and welfare of that child has to be the paramount consideration in deciding what action needs to be taken.

We make it clear to our candidates and clients that should they have any concerns about a member of staff, they should immediately inform their GSL Consultant and the Designated Safeguarding Lead at the school. Under no circumstances should a candidate ever intervene on his/her own.

All candidates and clients are advised of the processes that should be followed and given access to our policies. Detailed instructions are contained in our 'Complaints Policy and Procedure'.

Schools must provide information to agency staff about the processes they should follow if they have a concern.

Keeping Children Safe in Online and Remote Education Provision

Keeping students and teachers safe during remote education is essential.

Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online, as well as face to face and, in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

Our online safeguarding processes are in line with the [Keeping Children Safe in Education \(Paragraphs 134 to 151\)](#).

More information can also be found in the Department of Education's guide to [Safeguarding and remote education](#).

In addition to promoting online safety whether students are tutored online at home or in school, we are committed to promoting mental health and wellbeing. Our tutors will work in partnership with schools and parents/guardians in order to develop the most effective course of learning, which incorporates opportunities for learning how to stay safe online, voicing worries and concerns, as well as promoting confidence and resilience.

Our tutors will also ensure that they work with schools to follow policies in place to ensure effective filtering and monitoring of online activity.

GSL Online and Remote Tutoring (at home and in school)

For all online and remote tutoring, GSL will ensure that:

- All sessions are booked via the client school, including any rearranged sessions
- All online sessions are delivered via our secure platform, unless the school provides an alternative
- Clear messages around staying safe online are communicated to all students and parents/guardians
- Clear communication pathways are identified to all parties
- Clear instructions for identifying and communicating concerns are provided to all parties
- Filtering and monitoring policies are closely followed

Our Staff and Tutors:

- All staff understand (through targeted training) how to promote and monitor child protection and safeguarding in online and remote tutoring sessions, and how to respond if concerns are identified.
- All tutors are expected to abide by our Adult Code of Conduct and undergo training on how to conduct themselves in a safe and appropriate manner throughout online and remote tutoring sessions.
- All tutors have clear and appropriate methods of communication in place
- All training sessions are recorded and stored (only on our dedicated platform) in accordance with GDPR requirements
- GSL has a designated Safeguarding Officer who is responsible for supporting and training all staff

Our schools:

- All clients will be asked to provide us with their policies and procedures relating to Child Protection, Safeguarding, Filtering and Monitoring and Behaviour Management with specific emphasis on online and remote tutoring provision.
- We will ask all clients to communicate with us about developing risk assessments where required.
- In partnership with our clients, we will collate a list of all key staff involved in Safeguarding and Child Protection and agree a clear pathway of communication should concerns be raised.

Our parents/guardians:

- In partnership with our clients, we will ensure all parents/guardians are informed of the benefits and risks of online and remote tutoring; the safety features of our online tutoring platform, as well as how to keep their children safe online and in remote tutoring.
- Clear guidance will be provided on expected behaviour and acceptable communication pathways - both from students and their parents/guardians, and from tutors.
- We will ensure that it is understood that a parent/guardian must always be present in the room whilst online tutoring takes place in the home.
- All parents/guardians will be informed of how to identify and raise safeguarding concerns; and will be provided with the key points of contact.

The Designated Safeguarding Officer

Our Designated Safeguarding Officer has 20 years' experience in education as a teacher, pastoral lead and middle manager, is trained at Level 3 and is responsible for maintaining an up-to-date knowledge and understanding, through refresher training at least every 3 years and a commitment to ongoing research and engagement with updates from relevant groups such as NSPCC and The Safeguarding Network.

They are responsible for:

Managing Referrals of cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and

- where a crime may have been committed to the Police as required. NPCC – When to call the police should help understand when to consider calling the police and what to expect when working with the police

Working with others:

- Acting as a source of support, advice and expertise for all staff
- Acting as the central point of contact for all staff and safeguarding partners to refer and discuss any safeguarding concerns
- Liaising with school safeguarding teams, local authorities, police and social services as required, including attendance at multi agency meetings
- Monitoring and developing policies and procedures to ensure that they remain accurate and fit for purpose
- Organising training for GSL staff on Safer Recruitment Practice, Safeguarding and Child Protection
- Developing and reviewing training materials and guidance documents for candidates who register with GSL
- Communicating updated information and guidance to staff and candidates
- Reporting to the company directors at board meetings, with recommendations for improvements in practice

Storage of Records:

- Managing and keeping secure records of referrals and investigations, in partnership with Client schools and the relevant Local Authority
- Records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, a note of any action taken, decisions reached with the rationale and the outcome.

Managing Safeguarding and Child Protection

Safeguarding and Child Protection referrals

The process for managing referrals is detailed in the [‘Complaints Policy and Procedure’](#).

► What Should Be Happening in Schools? Reporting Flowchart

Actions by the school

Actions by the
external agencies

Staff have concerns about a child and follow safeguarding procedure.

Referral not required –
support offered pastorally
within school.

Referral made if concerns
escalate.

DSL makes referral to social
care and/or police if
necessary.

Social services to make decision about requirements within one working day.

1. Immediate protection
needed – referrer
informed.

2. Section 47 enquiries
needed – referrer
informed.

3. Section 17 enquiries
needed – referrer
informed.

4. No further
assessment needed –
referrer informed.

a. Action taken by social
worker, police or
NSPCC.

b. Identify child at risk of
significant harm and
child protection plan.

c. Identify child in need
and appropriate
support plan.

School offers pastoral
support and considers
early help assessment
and services support.

Staff constantly keep child's situation under review and help the services where possible.

We work in partnership with safeguarding teams in schools to align our Safeguarding, Child Protection and Behaviour policies and procedures.

All concerns should be reported to the relevant Education Consultant within 1 day, who will notify the Branch Manager and our DSO (Sarah Andrews). Our DSO will liaise with school safeguarding teams and external agencies as required.

Outcomes of investigations will be recorded securely and areas for development discussed at board meetings.

Should GSL become aware of concerns about one of our candidates in placement, our DSO will contact the school's safeguarding team within 1 day.

Should a referral be made about a GSL candidate they **should not** automatically be suspended from their placement. This decision will be made in partnership with the school safeguarding team.

"In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to

suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation” (KCSIE 2024 Part 4, paragraph 381)

What to Do if a Child Makes a Disclosure

All staff and candidates must be up to date with what to do if a child tells them that he/she is being abused or neglected, or raises a concern regarding their own safeguarding or that of another pupil.

- Maintain an **appropriate level of confidentiality**, only involving those who need to be involved, such as the GSL consultant, DSO, DSL (or deputy DSL) and children’s social care officer.
- **Never promise** a child that you will not tell anyone about a report of abuse, as this may ultimately not be in the best interests of the child.
- Work to **reassure** victims who make an allegation, that they will be **taken seriously, supported and kept safe**. You should also ensure that the victim does not feel as though they are creating a problem by, or feel ashamed for, reporting abuse, sexual violence or sexual harassment.

Responding to referrals

- **Listen** – encourage and reassure
- **Record** – facts in their words, open questions or Tell, Explain, Describe (TED)
- **Refer** – school DSL and GSL consultant
- **Review** – ask what action was taken

What to Do if a Candidate or School Makes a Disclosure

All consultants must know what to do if:

- A **candidate** reports a concern about a school, student or colleague
- A **school** reports a concern about a candidate

Step 1

- **Record** the details of the concern using facts only (no leading questions or requests for speculation) **GSL - Incident Report Form**
- Ask if there are any witnesses or any evidence
- Make a note of **actions** that have been taken (has a LADO referral been made?)

Step 2

- **Notify** the branch manager and company DSO Sarah Andrews –send her the form and any additional evidence

If the allegation is about a candidate:

- **Do not disclose details of the allegation to the candidate** until you have spoken to the company DSO and determined that a police investigation is not necessary.
- If the candidate is removed/suspended from the booking (this must not be an automatic reaction), inform them that an allegation has been made giving them a chance to disclose to you. Advise them to contact their union if they have one and ask if they have support mechanisms in place.

Recording Concerns

All reports will initially be recorded in writing by the GSL Consultant using the GSL Incident Report Form.

This is then passed to the GSL DSO who will review and securely collate the information with any reports from schools/candidates.

The GSL DSO will then coordinate any ongoing investigations, attend safeguarding meetings where required, and make referrals to local authorities, DBS and DfE where required.

Records will include clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome. A copy will be provided to the person concerned where agreed by the LADO and relevant authorities along with a declaration as to whether the information will be referred to in any future reference.

In the interest of clarity and consistency, GSL will use the same outcome criteria for Low Level Concerns as for concerns that meet the Harm Threshold.

The Harm Threshold may be met where it is alleged that anyone working in the school or a college that provides education for persons under 18 years of age, including supply teachers, volunteers and contractors has:

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

Low Level Concerns:

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
 - being over friendly with children
 - having favourites
 - taking photographs of children on their mobile phone, contrary to school policy
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
 - humiliating children.

The definitions will be used to define the outcome of a referral are:

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 or cause harm to the person subject of the allegation

False: there is sufficient evidence to disprove the allegation

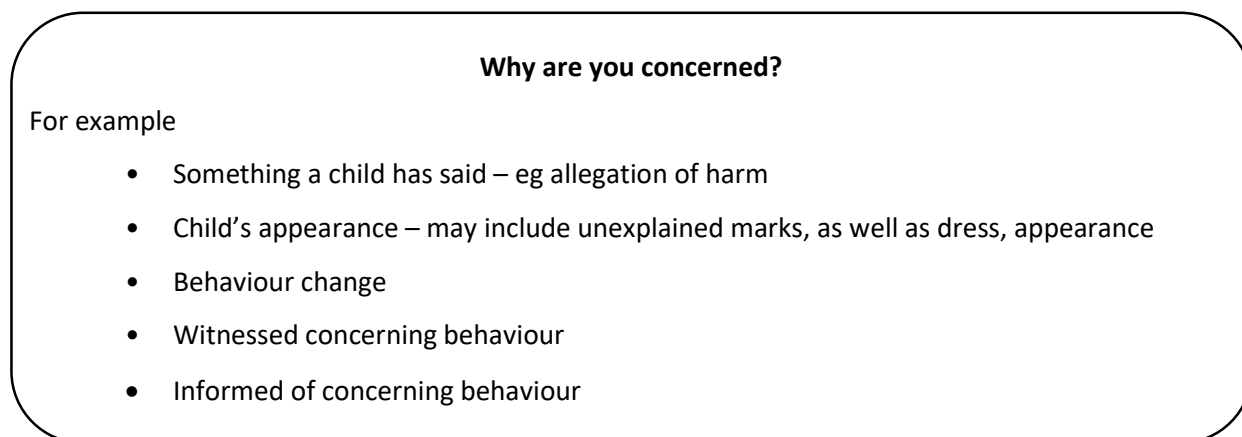
Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to the school or college depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future.

GSL recognise the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children’s welfare and protect them from harm. This includes contributing to LADO processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

Please see below for a flow chart of how referrals are managed at GSL Education.



Candidate:	Tutor:	Client:	GSL Consultant:
Act immediately and record your concerns. If urgent, speak to a DSL/DSO first.			
Follow the school procedure Listen – encourage and reassure Record – facts in their words, open questions or Tell, Explain, Describe (TED) Refer – school DSL and GSL consultant Review – ask what action was taken Sign and date your records Seek support for yourself if required from DSL	Follow the school procedure If not linked to a school contact local LADO or Police and your GSL consultant. Listen – encourage and reassure Record – facts in their words, open questions or Tell, Explain, Describe (TED) Refer – school DSL and GSL consultant Review – ask what action was taken Sign and date your records	Follow the school procedure Inform your GSL consultant Provide as much detail as possible in writing: Summary of the concern Dates and times Actions taken Provide any witness statements/evidence	Inform your Branch Manager and DSO Complete the GSL Incident Report Form and submit to DSO Provide any statements/evidence Do not discuss the details of the referral with the candidate about whom a referral has been made

If relates to yourself or another candidate – inform your GSL consultant	Seek support for yourself if required from DSL If relates to yourself or another candidate – inform your GSL consultant		
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Inform the GSL DSO (Sarah Andrews sarah.andrews@gsleducation.com)



Designated Safeguarding Officer

Store and Review the information provided
Consider level of risk
Liaise with school safeguarding team, and local LADO
Advise branch manager and consultant of actions required
Co-ordinate actions and referrals to DBS, DfE where required
Ensure records are accurate and up to date
Review related policies and procedures and make recommendations
Report to directors at board meeting



If you are unhappy with the response

Staff:

Follow internal escalation procedure
Follow Whistleblowing policy

Candidates/Tutors:

Follow school complaint procedures
Follow GSL complaints procedures

Clients:

Follow GSL complaints procedures

Record decision making and action taken in secure safeguarding folder and on candidate's/tutor's file where relevant.



Monitor

Clients will be responsible for monitoring the child(ren)
GSL will monitor candidates if they continue to work with us

Be clear about:

- What needs to be monitored
- What additional training is required for the candidate/tutor
- A clear risk assessment states what information should be shared with future clients
- A clear risk assessment states what actions have been taken to minimise risk
- A clear risk assessment states what criteria will be used to identify new concerns
- A clear risk assessment states how long monitoring will be in place for and the criteria for closure



Review and request further support if needed



GSL – Safeguarding Statement 2024

GSL Education is an employment business supplying temporary workers to work within the education sector. Please note that in accordance with the Conduct Regulations, we will not provide staffing cover for staff absent due to industrial action. The work seekers that we engage must pass thorough and robust vetting procedures before we can consider them for any placement or assignment with our clients and this policy sets out our commitment to comply with the highest standards at each stage of the recruitment process.

Our processes are compliant with relevant legislation and the Department for Education's statutory guidance: **Keeping Children Safe in Education**. We ensure our temporary workers remain compliant throughout their time with GSL Education by undertaking the required regular checks.

GSL Education is fully committed to safeguarding the welfare of all children in its care. It recognises the responsibility to promote safe practice and to protect children from harm, abuse and exploitation.

All staff have undergone and have satisfied all the necessary recruitment and vetting checks, including the need for an Enhanced DBS Disclosure (including Children's Barred List check).

Our rigorous procedures are set by the auditing bodies [REC's \(Recruitment and Employment Confederation\)](#) and [Crown Commercial Service \(CCS\)](#), and are detailed for each individual on their 'Vetting Sheet' which is supplied to the client for each booking.

GSL undertakes repeat status checks on the Update Service at least once a year, or more often if required by our clients, but no more than four times a year. We always obtain the work seeker's consent to undertake a status check.

For each visit, GSL supplies a secure vetting sheet which includes a photograph, the Enhanced DBS Certificate numbers for the named employees of our organisation, together with the date when each of the DBS checks was undertaken and checked on the update service.

GSL will notify the client of any issues that have been raised as a result of the DBS, so that the setting may make appropriate decisions as to whether the person is suitable to work with children. The

vetting sheet also includes confirmation of the dates each check was carried out and the number of appropriate references we have received.

GSL instructs our staff to provide acceptable photo identification on each visit to the setting premises.

GSL has appropriate systems in place to ensure that any organisations to whom we sub-contract work in their settings adhere to the aforementioned recruitment and vetting standards.

GSL Education has a responsibility to act if a candidate becomes unsuitable for employment whilst on placement. If we receive or obtain information which indicates that a candidate is no longer suitable for their current position, we will act immediately in accordance with our **Policy Statement for Candidates who become unsuitable** and our **Complaints Policy & Procedure**.

Safeguarding and Child Protection referrals

We work in partnership with safeguarding teams in schools to align our Safeguarding, Child Protection and Behaviour policies and procedures.

All concerns should be reported to the relevant Education Consultant within 1 day, who will notify the Branch Manager and our DSO (Sarah Andrews). Our DSO will liaise with school safeguarding teams and external agencies as required.

Outcomes of investigations will be recorded securely and areas for development discussed at board meetings.

Should GSL become aware of concerns about one of our candidates in placement, our DSO will contact the school's safeguarding team within 1 day.

Should a referral be made about a GSL candidate they should not automatically be suspended from their placement. This decision will be made in partnership with the school safeguarding team.

Keeping Children Safe in Online and Remote Education Provision

Keeping students and teachers safe during remote education is essential.

Our online safeguarding processes are in line with the [Keeping Children Safe in Education \(Annex C\)](#).

More information can also be found in the Department of Education's guide to [Safeguarding and remote education](#).

In addition to promoting online safety whether students are tutored online at home or in school, we are committed to promoting mental health and wellbeing. Our tutors will work in partnership with

schools and parents/guardians in order to develop the most effective course of learning, which incorporates opportunities for learning how to stay safe online, voicing worries and concerns, as well as promoting confidence and resilience.

Our tutors will also ensure that they work with schools to follow policies in place to ensure effective filtering and monitoring of online activity.

GSL Online and Remote Tutoring (at home and in school)

For all online and remote tutoring, GSL will ensure that:

- All sessions are booked via the client school, including any rearranged sessions
- All online sessions are delivered via our secure platform, unless the school provides an alternative
- Clear messages around staying safe online are communicated to all students and parents/guardians
- Clear communication pathways are identified to all parties
- Clear instructions for identifying and communicating concerns are provided to all parties
- Filtering and monitoring policies are closely followed

Our Staff and Tutors:

- All staff understand (through targeted training) how to promote and monitor child protection and safeguarding in online and remote tutoring sessions, and how to respond if concerns are identified.
- All tutors are expected to abide by our Adult Code of Conduct and undergo training on how to conduct themselves in a safe and appropriate manner throughout online and remote tutoring sessions.
- All tutors have clear and appropriate methods of communication in place
- All training sessions are recorded and stored (only on our dedicated platform) in accordance with GDPR requirements
- GSL has a designated Safeguarding Officer who is responsible for supporting and training all staff

Our schools:

- All clients will be asked to provide us with their policies and procedures relating to Child Protection, Safeguarding, Filtering and Monitoring and Behaviour Management with specific emphasis on online and remote tutoring provision.
- We will ask all clients to communicate with us about developing risk assessments where required.
- In partnership with our clients, we will collate a list of all key staff involved in Safeguarding and Child Protection and agree a clear pathway of communication should concerns be raised.

Our parents/guardians:

- In partnership with our clients, we will ensure all parents/guardians are informed of the benefits and risks of online and remote tutoring; the safety features of our online tutoring platform, as well as how to keep their children safe online and in remote tutoring.
- Clear guidance will be provided on expected behaviour and acceptable communication pathways - both from students and their parents/guardians, and from tutors.
- We will ensure that it is understood that a parent/guardian must always be present in the whilst online tutoring takes place in the home.
- All parents/guardians will be informed of how to identify and raise safeguarding concerns; and will be provided with the key points of contact.

GSL SAFER RECRUITMENT POLICY

Last Updated	September 2024
Next Review	September 2025

Our safeguarding processes are in line with the [Department for Education](#), [REC's](#) (Recruitment and Employment Confederation) and Crown Commercial Supplier Framework guidelines.

Recruitment and Vetting Checks

To be employed with GSL Education, candidates must be fully registered following our detailed Registration and Vetting Procedure. To fully register, and be cleared for work they must successfully complete and provide the following:

1. Proof of Identity and Right to Work in the UK
2. Proof of current Address
3. Proof of relevant qualifications
4. Mental and Physical Health questionnaire
5. Criminal Convictions Checks – Relevant enhanced DBS with barred list check
6. Reference and Work History Checks – including overseas
7. Professional Regulation and prohibition Checks
8. Interview

1. IDENTITY CHECK AND RIGHT TO WORK IN THE UK

Candidates must provide their identification documentation to confirm both their proof of identity (via photo ID) and proof of eligibility to remain and work in the UK.

There are 3 basic steps to conducting a manual right to work checks:

1. OBTAIN – Obtain original versions of one or more acceptable documents
2. CHECK – Check the document's validity in the presence of the holder
3. COPY – Make and retain a clear copy, and record the date the check was made.

Some candidates will be eligible to demonstrate their ID and RTW using an IDSP. We have engaged the services of an IDSP which meets the requirements set out by the Home Office. This will only be used for candidates who can provide a valid UK Passport.

For candidates able to demonstrate their ID and RTW using digital checks, video document sightings may be used.

Please check Home Office's [Employer's Guide to Right to Work Checks](#) and [Right to Work Checklist](#).

Number for the Home Office: 0300 123 5434

2. PROOF OF CURRENT ADDRESS CHECK

Candidates must provide one official document with a current date, their name and address printed on it. Examples are:

- Any utility bill in their name (dated within the past 3 months)
- A bank statement (dated within the past 3 months)
- HMRC doc or Council tax bill (dated within the past 12 months)

Please check the [full list of acceptable documents](#) for more information.

The original document must be sighted, and verified. A signed and dated declaration will be kept on file to confirm that the documents have been thoroughly checked.

3. QUALIFICATION CHECKS

Where possible, we insist on seeing and retaining copies of original teaching qualifications and recording DfES numbers. Teachers must have a university degree to be employed with us as a teacher. If the degree has been obtained overseas the candidate should NARIC/ENIC check their qualification. All foreign qualifications should be translated and converted to UK standards.

Teachers who qualified outside of the EEA, Australia, New Zealand, the United States and Canada, are required to obtain QTS within 4 years.

Original copies of any other relevant qualifications (specific to the role applied for) will also be verified and copies will be kept on file (e.g. coaching certificates).

As a registered member of the TRA website, we can verify if a candidate is a qualified teacher and their status. If a candidate has QTLS, we use the Professional Register held by the Society for Education and Training.

To check teacher status, we perform the TRA Teacher Status Check via the Department for Education's [sign-in-portal](#). To check the status for non-teaching staff, we perform the 'TRA List Check' via the same portal. (To check teachers registered in other areas, we will check the relevant Teaching Council records for that area eg Scotland – check the Register held by the [General Teaching Council for Scotland](#))

4. HEALTH CHECKS

All teachers and support staff are required to complete a health check questionnaire declaration, confirming that they have no registerable diseases or any other medical condition or disability that would affect their ability to perform his or her role. The health check questionnaire can be found in the online registration form that is completed during registration. Candidates are required to inform GSL if any information changes.

5. CRIMINAL CONVICTIONS CHECKS

ALL candidates recruited through GSL Education are fully vetted to the standards given and directed by the Department of Education and Skills. As a member of the Recruitment and Employment Confederation (REC) we adhere to strict guidelines and codes of practice.

It is required that every candidate has a relevant Enhanced DBS Check with Barred List check. The DBS must be registered online to the Update Service*. GSL will check the update service every 12 months for all candidates. If a DBS is no longer on the update service, a new check will be required.

**If the DBS is obtained through GSL and not registered online to the update service, then it is valid for a maximum period of 12 months, after which a new check will be required.*

Where a candidate's DBS is completed via a GSL application, but the certificate has not yet been received by the candidate, and time is an issue; we inform the school of the status of the DBS, supply the school with the platform report and adhere to the school's wishes regarding the placement of the candidate. If the school decides to accept the teacher while their physical DBS is still pending, we will ask the school to sign a disclaimer acknowledging the status of the disclosure and accepting responsibility for the candidate while their disclosure is pending. If the school does not wish to accept the candidate, we will endeavour to find a suitable, fully vetted replacement that the school is happy with. (This option is only available where the DBS report shows no convictions present.)

Overseas candidates and any candidates who have been outside the UK for 6 months or more during the previous 5 years, must obtain a Police Clearance Certificate from their Country*, and where a physical document is presented, the original should be sighted, verified and held on file. (If the certificate is digitally produced, it should be verified online using the relevant official site.) A UK DBS must be acquired before the first placement in a school.

**where it is not possible to obtain a Police Clearance Certificate, a Letter of Good Conduct can be used, which should be from a professional source, on headed paper and translated into English.*

Positive disclosure results:

Where a candidate has any convictions or cautions, we refer to REC and/or the DfES for guidance. All recruitment decisions will be made in consultation with the DSO. When supplying candidates to undertake regulated activity with children, posts are exempt from the Rehabilitation of Offenders Act 1974. Where an agency wishes to place a candidate, who has two non-custodial convictions: eg one for driving offences and one for shoplifting, in this situation, the agency can make a recruitment decision about using the candidate, but must inform a client school and securely send them a copy of the DBS check prior to a booking, so the school can decide whether they wish to use the candidate in question. We will also ask the candidate to complete a 'Caution or Conviction' form and file this with the candidate's copy of their DBS.

6. REFERENCE & HISTORY CHECK

Candidates must provide an up-to-date CV/work history which covers the last 10 years*. There should be no gaps longer than 1 month without a clear reason being given, and all dates should show month and year.

**If a candidate cannot provide a 10 year history due to age, they should provide a full CV which includes their most recent schooling details.*

Candidates must give the contact details of at least two referees that they have worked for within the last two years. These referees should cover all employment from the last 2 years. The first reference should be from their most recent employer. Both references should ideally be from teaching positions or work with children. If the candidate has not worked in an educational setting within the 2 years, but there is previous experience on the CV, within 7 years, a reference must be requested from this setting.

The referee is contacted in writing. It is requested that the prepared reference questionnaire form is filled in, asking certain questions about the candidate's previous work performance. These include stating what responsibilities the position involved, the candidate's record of attendance and punctuality, how long they have known the candidate, their relationship to the candidate, the candidate's suitability for the post applied for, their reason for leaving and whether or not they consider there to be any reason why the candidate would not be suitable for working with children. (the minimum requirement for a reference is confirmation of work date, confirmation of any safeguarding or disciplinary issues and reasons for leaving)

A full set of written references should be returned and checked before the candidate is sent out to work. (In circumstances where references are pending, a school can make an informed decision whether to recruit the candidate. If they decide to recruit the candidate, they must provide confirmation to GSL Education that they have made this informed decision.)

In regards to open references, we will confirm that these were written by the referee by emailing the scanned copy of the original to the referee and asking them to confirm.

When obtaining references from other agencies, we send an agency reference form to the agency requesting basic information, including the date of registration, approx. number of days worked, if they are aware of any reason why the candidate would not be suitable for working with children, and if the candidate is still working through them.

Where professional references cannot be obtained, character references may be used. These must not be from immediate family members and where possible should be from a professional and sent from a professional email address or using headed paper.

For candidates who have been employed overseas within last 5 years, references will also be requested for these placements. These must satisfy the same criteria and either be written in or officially translated into English.

In all situations where the required references cannot be obtained, a decision will be made as to whether the candidate is suitable for employment. For all candidates with limited references, clients will be informed and required to complete a disclaimer to evidence their decision to continue with the booking. In these situations, feedback forms will be requested from the booking.

Checks will be made to ensure that the references match the details held on the candidate's CV/work history.

7. PROFESSIONAL REGULATION AND PROHIBITION CHECKS

As a registered member of the Teaching Regulation Agency website, we have full access to check whether teachers or others are suspended from teaching or have sanctions. The website will also verify whether a candidate is a qualified teacher as well as whether non-teaching staff have any disciplinary issues, prohibitions, sanctions or restrictions that might prevent them from taking part in certain activities or working in specific positions and provide a list of those prohibited under the 128 check.

To check teacher status, we perform the TRA 'Teacher Status Check' and 'TRA List Check' via the Department for Education's [sign-in-portal](#).

If a candidate has QTLS, we use the Professional Register provided by the Society for Education and Training to verify continued registration. (A link to this can be accessed via the TRA site as well.

All checks are done at least annually and any restrictions are logged within the candidate's record and periodically reviewed to ensure compliance adherence.

Positive check result:

Should any check return a positive result a decision will be made as to whether to continue to hire the candidate. Where necessary, we refer to REC and/or the DfES for guidance and risk assessments will be created where required. Prior to booking a candidate with a positive result on their record, we will inform a client school, so the school can decide whether they wish to use the candidate and we will provide copies of risk assessments on request.

8. INTERVIEWS

All candidates will be individually interviewed. Candidates are interviewed face-to-face or, if they can verify their ID and Right to Work digitally, via video call by one of our Recruitment Consultants or Support Consultants, who are all trained in safer recruitment interview techniques and are qualified and experienced in selecting and supplying a candidate to an education setting. A written interview report is completed during the interview. Candidates are asked questions on their:

- Knowledge of the National Curriculum,
- Knowledge of their specialist subject area,
- Knowledge and understanding of Safeguarding and Child Protection
- Commitment to equal opportunities,
- IT skills,
- Classroom management experience and
- Teaching techniques or skills relevant to the role
- Additional relevant skills and experiences

Candidates for Tutoring are asked additional questions related to online, on-site, off-site, face-to-face provision, including safeguarding, child protection, behaviour management, online safety, information sharing, appropriate behaviours.

Observations are also made about each candidate's personal presentation, personality and communication skills. The candidate must successfully pass each section to be considered for employment with us.

ADDITIONAL DOCUMENTATION REQUESTED

As well as the aforementioned compulsory items, we also ask candidates to provide the following so that we can gain a more thorough knowledge of their work experience and skills:

1. CURRICULUM VITAE/WORK HISTORY (10 YEARS)

This can be sent to schools along with a covering letter and the candidate's supporting statement

2. SUPPORTING STATEMENT

An essay-style document discussing in more detail the candidate's teaching experience

3. WRITTEN TESTIMONIALS

These are particularly useful for overseas candidates applying for permanent positions

4. PASSPORT-TYPE PHOTOGRAPH

This is attached to the candidate's file for easy identification and familiarisation

VETTING SHEET

GSL is required to provide written information to clients about work-seekers that we propose to them. In line with the Conduct Regulations, this information must include confirmation of the identity of the work-seeker, confirmation that the work-seeker has the experience, training, qualifications and any authorisation that the client considers necessary or that are required by law or by any professional body, and confirmation that the work-seeker is willing to work in the position. The Vetting Sheet is also designed to provide all the required information that schools must record on their Single Central Record (in line with KCSIE guidance).

The **Vetting Sheet** is stored in the timesheet portal. It can also be provided along with booking confirmation as a secure PDF. Clients can view / download it securely from the portal or confirmation email.

The Vetting Sheet includes the following information (where applicable):

- Full Name, DOB, NI No
- Position (which the candidate has confirmed they are willing to work)
- DBS details
- Teacher Reference Number/SET registration number
- Date of Qualification Checks
- No of References received
- Date of ID check & Right to Work Checks
- Right to Work Docs provided
- Date of Employer Access Check
- Date Visa checked And Visa Expiry Date
- Date of Overseas Police Check
- Date of Prohibition Checks
- Date read "Keeping Children safe in Education Part 1"
- Dates of Safeguarding and Prevent Training (if relevant)
- Pay type (PAYE or Umbrella)

NEW STAFF VETTING DETAILS

Hull: 01482 739 633 Kent: 01227 937 181 Leicester: 01164 788 000 London: 020 7739 2211
 Chelmsford: 01245 203 218 Manchester: 0161 537 6500 Newcastle: 01919 337 888 Plymouth: 01752 429 845
 South Yorkshire: 01143 993 815 Watford: 01923 954 070 Bournemouth: 012 0297 0200
 Southampton: 023 8001 5055 Safeguarding: 020 3873 0565



Below are the vetting details of the Teacher/Support Staff new to your school:

*Copies of Qualifications and References can be made available upon request

NAME	Joe Bloggs-Test	DOB: 03/05/1974
POSITION (candidate confirmed they are willing to work in):	Teacher	



DBS DETAILS				
DBS Disc. No	001630214998			
*All enhanced DBS checks and subsequent update service checks include barred list checks	Enhanced (incl Barred List Check)	✓	Standard	
Issued through GSL?	No	Issue Date	18/09/2018	
On Update Service?	No	Check Date	18/09/2024	
Convictions?	CLEAR	Risk Assessment?	Yes	

ADDITIONAL CHECKS			
NI Number	JE246491D	Teacher Number (QTS/QTLS only)	97/46391
Contract Type	Umbrella	Date of Qualification review	01/03/2024
Umbrella Company	Generate FS		
No of References Received*	2 of 3	QTS achieved date	30/07/2000
Date of ID sighting	01/09/2024	Induction Status	EXEMPT
Date of Right to Work sighting	01/09/2024	Date of Employer Access Check	01/09/2024
ID/Right to Work Docs supplied	UK Passport, Biometric Residence Permit and Biometric Residence Permit	Date of Prohibition Check (128)	01/09/2024
Date RTW status checked (if applicable)	N/A	Date of Childcare Disqualification Declaration	30/08/2024
RTW Expiry (if applicable)	N/A	Date read 'Keeping Children Safe in Education Part 1'	30/08/2024
Date of Overseas Police Check(s)	N/A	Safeguarding Course Date (if applicable) *Please note KCSIE understanding is fully assessed in interview (min requirement)	01/09/2024
Any adjustments required for medical conditions?	No		
Additional information (if relevant)			

Kind Regards, Compliance Team

FEEDBACK OR COMPLAINT FORM

Please let us know how our candidates got on during their assignment with you. Please complete the online feedback form for [Teacher](#) and [Support Staff](#).

In the event of a complaint about the conduct of a temporary worker we have supplied to you, please fill in the [online form](#). Please note that every complaint is taken seriously, and the candidate involved will be informed. The outcome of our investigation will be given to you in writing. We may request further documentation or to interview the persons involved if the complaint form does not provide sufficient information.

For more information on complaints and safeguarding, please read our **Complaints Policy & Procedure**.

GSL - EQUAL OPPORTUNITIES AND DIVERSITY POLICY

Last Updated	September 2024
Next Review	September 2025

Company Name:	GSL Education ("the Company")
Model Policy No.	GSL/POL/008.2
Model Policy Name:	Equal Opportunities and Diversity Policy
Date:	Sep 2019
Last Reviewed	Nov 2024

OUR POLICY

GSL Education embraces diversity and aims to promote the benefits of diversity in all of our business activities. We seek to develop a business culture that reflects that belief. We will expand the media in which we recruit to in order to ensure that we have a diverse employee and candidate base. We will also strive to ensure that our clients meet their own diversity targets.

GSL Education is committed to diversity and will promote diversity for all employees, workers and applicants. We will continuously review all aspects of recruitment to avoid unlawful discrimination.

GSL Education will treat everyone equally and will not discriminate on the grounds of an individual's "protected characteristic" under the Equality Act 2010 (the Act) which are age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. We will not discriminate on the grounds of an individual's membership or non-membership of a Trade Union. All staff have an obligation to respect and comply with this policy. GSL Education is committed to providing training for its entire staff in equal opportunities and diversity. GSL Education will avoid stipulating unnecessary requirements which will exclude a higher proportion of a particular group of people and will not prescribe discriminatory requirements for a role.

GSL Education will not discriminate unlawfully when deciding which candidate/temporary worker is submitted for a vacancy or assignment, or in any terms of employment or terms of engagement for temporary workers. GSL Education will ensure that each candidate is assessed in accordance with the candidate's merits, qualifications and ability to perform the relevant duties for the role.

DISCRIMINATION

Under the Act unlawful discrimination occurs in the following circumstances:

Direct discrimination

Direct discrimination occurs when an individual is treated less favourably because of a protected characteristic. Treating someone less favourably means treating them badly in comparison to others that do not have that protected characteristic.

It is unlawful for a recruitment consultancy to discriminate against a person on the grounds of a protected characteristic:

- in the terms on which the recruitment consultancy offers to provide any of its services;
- by refusing or deliberately omitting to provide any of its services;
- in the way it provides any of its services.

Direct discrimination can take place even if the individual does not have the protected characteristic but is treated less favourably because it is assumed he or she has the protected characteristic or is associated with someone that has the protected characteristic.

Direct discrimination would also occur if a recruitment consultancy accepted and acted upon instructions from an employer which states that certain persons are unacceptable due to a protected characteristic, unless an exception applies. The Act contains provisions that permit specifying a requirement that an individual must have a particular protected characteristic in order to undertake a job. These provisions are referred to as occupational requirements.

Where there is an occupational requirement then the client must show that applying the requirement is a proportionate means of achieving a legitimate aim, i.e. the employer must be able to objectively justify applying the requirement. An occupational requirement does not allow an employer to employ someone on less favourable terms or to subject a person to any other detriment. Neither does an occupational requirement provide an excuse against harassment or victimisation of someone who does not have the occupational requirement.

Indirect discrimination

Indirect discrimination occurs when a provision, criterion or practice (PCP) is applied but this results in people who share a protected characteristic being placed at a disadvantage in comparison to those who do not have the protected characteristic. If the PCP can be objectively justified it will not amount to discrimination.

Indirect discrimination would also occur if a recruitment consultant accepted and acted upon an indirectly discriminatory instruction from an employer.

If the vacancy requires characteristics which amount to an occupational requirement or the instruction is discriminatory but there is an objective justification, GSL Education will not proceed with the vacancy unless the client provides written confirmation of the occupational requirement, exception or justification.

GSL Education will use best endeavours to comply with the Act and will not accept instructions from clients that will result in unlawful discrimination.

Harassment

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual. This includes unwanted conduct of a sexual nature.

GSL Education is committed to providing a work environment free from unlawful harassment. We have separately enacted the new [GSL Sexual Harassment Policy 2024](#) in place after the recent change in the legislation in 2024.

Victimisation

Under the Act victimisation occurs when an individual is treated unfavourably because he/she has done a 'protected act' which is bringing a claim for unlawful discrimination or raising a grievance about discrimination or giving evidence in respect of a complaint about discrimination.

GSL Education will ensure that the consultants do not victimise any individual.

DISABLED PERSONS

Disability Discrimination occurs when a person is treated unfavourably as a result of their disability.

Indirect discrimination occurs where a provision, criterion or practice is applied by or on behalf of an employer, or any physical feature of the employer's premises, places a disabled person at a substantial disadvantage in comparison with persons who are not disabled.

In recruitment and selection there may be a requirement to make reasonable adjustments. For example, it might be necessary to have different application procedures for partially sighted or blind applicants that enable them to use Braille. With testing and assessment methods and procedures, tests can only be justified if they are directly related to the skills and competencies required for the job. Even then, it might be appropriate to have different levels of acceptable test results, depending on the disability. For example, an applicant with a learning disability might need more time to complete a test, or not be expected to reach the same standard as other non-disabled applicants.

Reasonable adjustments in recruiting could include:

- modifying testing and assessment procedures;
- meeting the candidate at alternative premises which are more easily accessible;
- having flexibility in the timing of interviews;
- modifying application procedures and application forms;

- providing a reader or interpreter.

Wherever possible GSL Education will make reasonable adjustments to hallways, passages and doors in order to provide and improve means of access for disabled employees and workers. However, this may not always be feasible, due to circumstances creating such difficulties as to render such adjustments as being beyond what is reasonable in all the circumstances.

GSL Education will not discriminate against a disabled person:

- in the arrangements i.e. application form, interview or arrangements for selection for determining whom a job should be offered; or
- in the terms on which employment or engagement of temporary workers is offered; or
- by refusing to offer, or deliberately not offering the disabled person a job for reasons connected with their disability; or
- in the opportunities afforded to the person for receiving any benefit, or by refusing to afford, or deliberately not affording him or her any such opportunity; or
- by subjecting the individual to any other detriment (detriment will include refusal of training or transfer, demotion, reduction of wage, or harassment).

GSL Education will make career opportunities available to all people with disabilities and every practical effort will be made to provide for the needs of staff, candidates and clients.

AGE DISCRIMINATION

Under the Act, it is unlawful to directly or indirectly discriminate against or to harass or victimise a person because of age. Age discrimination does not just provide protection for people who are older or younger. People of all ages are protected.

A reference to age is a reference to a person's age group. People who share the protected characteristic of age are people who are in the same age group.

Age group can have various references:

Under 21s

People in their 40s

Adults

GSL Education will not discriminate directly or indirectly, harass or victimise any person on the grounds of their age. We will encourage clients not to include any age criteria in job specifications and every attempt will be made to encourage clients to recruit on the basis of competence and skills and not age.

GSL Education is committed to recruiting and retaining employees whose skills, experience, and attitude are suitable for the requirements of the various positions regardless of age. No age requirements will be stated in any job advertisements on behalf of the company.

If GSL Education requests age as part of its recruitment process such information will not be used as selection, training or promotion criteria or in any detrimental way and is only for compilation of personal data, which the company holds on all employees and workers and as part of its equal opportunities monitoring process. In addition, if under age 22, GSL will adhere to Conduct of Employment Agencies and Employment Business Regulations 2003 and other relevant legislation applicable to children or young candidates.

Where a client requests age or date of birth, this will have to be under an occupational requirement or with an objective justification which should be confirmed in writing.

PART-TIME WORKERS

This policy also covers the treatment of those employees and workers who work on a part-time basis, GSL Education recognises that it is an essential part of this policy that part time employees are treated on the same terms, with no detriment, as full time employees (albeit on a pro rata basis) in matters such as rates of pay, holiday entitlement, maternity leave, parental and domestic incident leave and access to our pension scheme. GSL Education also recognises that part time employees must be treated the same as full time employees in relation to training and redundancy situations.

GENDER REASSIGNMENT POLICY

GSL Education recognises that any employee or worker may wish to change their gender during the course of their employment with the Company.

GSL Education will support any employee or worker through the reassignment.

GSL Education will make every effort to try to protect an employee or worker who has undergone, is undergoing or intends to undergo gender reassignment, from discrimination or harassment within the workplace.

Where an employee is engaged in work where the gender change imposes genuine problems GSL Education will make every effort to reassign the employee or worker to an alternative role in the Company, if so desired by the employee.

Any employee or worker suffering discrimination on the grounds of gender reassignment should have recourse to the Company's grievance procedure.

RECRUITMENT OF EX-OFFENDERS

Where GSL Education has registered with the Disclosure and Barring Service (DBS) and has the authority to apply for criminal records checks on individual because they are working with children or vulnerable adults or both, we will comply with the DBS's Code of Practice which includes having a policy on the recruitment of ex-offenders.

COMPLAINTS AND MONITORING PROCEDURES

GSL Education has in place procedures for monitoring compliance with this policy and for dealing with complaints of discrimination. These are available from the **HR Manager** and will be made available immediately upon request. Any discrimination complaint will be investigated full.

For Branch contact details please visit our website

Website: www.gsleducation.com

Or you can email us: info@gsleducation.com

Designated Safeguarding Officer

Sarah Andrews

0203 8730 565

07903957036

[*sarah.andrews@gsleducation.com*](mailto:sarah.andrews@gsleducation.com)

[*safeguarding@gsleducation.com*](mailto:safeguarding@gsleducation.com)

Company Name:	GSL Education ("the Company")
Version	1
Model Policy Name:	Sexual harassment policy
Date:	25/11/2024

OUR POLICY

GSL Education is committed to ensuring that all its staff and applicants are treated with dignity and respect and treat others in the same way. We believe that all staff and applicants have the right to work in an environment which is free from any form of harassment, including sexual harassment.

GSL Education has a zero-tolerance approach to sexual harassment.

GSL Education is committed to ensuring that reasonable steps are taken to prevent sexual harassment to all employees, workers, and applicants. This policy will be reviewed and updated from time to time to ensure [Recruitment Company]'s compliance with its duties under the Equality Act 2010 as amended by the Worker Protection (Amendment of Equality Act 2010) Act 2023 to ensure that all reasonable steps are taken to prevent sexual harassment.

Harassment

Under the Act, harassment is defined as unwanted conduct that relates to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual, including conduct of a sexual nature.

Sexual Harassment

In accordance with the Worker Protection (Amendment of Equality Act 2010) Act 2023, [Recruitment Company] is committed to providing a work environment free from unlawful sexual harassment.

- 1.1 Sexual harassment is unwanted behaviour of a sexual nature which has the purpose or the effect of:
 - 1.1.1 violating the victim's dignity; or
 - 1.1.2 creating an environment that is intimidating, hostile, degrading, humiliating or offensive to the victim.
- 1.2 An individual of any gender may be the victim of sexual harassment.
- 1.3 Whilst not an exhaustive list, forms of sexual harassment can include:
 - 1.3.1 Slurs or unwanted sexual advances;
 - 1.3.2 Visual conduct such as derogatory or sexually oriented posters;
 - 1.3.3 Physical conduct such as assault, unwanted touching, or any interference because of sex, race, or any other protected characteristic basis;
 - 1.3.4 Threats and demands to submit sexual requests as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favours;
 - 1.3.5 Sexual comments or jokes;
 - 1.3.6 Unwelcome touching, hugging, massaging, or kissing.
- 1.4 If an individual believes that they have been sexually harassed, they should make an immediate report to **Kamal Ahmed** followed by a written complaint as soon as possible after the incident. The details of the complaint should include:
 - 1.4.1 Details of the incident
 - 1.4.2 Name(s) of the individual(s) involved.
 - 1.4.3 Name(s) of any witness(es)
- 1.5 GSL Education will undertake a thorough investigation of the allegations. If it is concluded that harassment has occurred, remedial action will be taken.

- 1.6 Where an incident/complaint of sexual harassment relates to a temporary agency worker the GSL Education will not carry out instructions from a hirer/and/or intermediary which it considers will amount to sexual harassment and victimisation.
 - 1.7 GSL Education will take reasonable steps to safeguard temporary workers it supplies and internal members of staff from harassment .
 - 1.8 GSL Education will ensure that the hirer has a sexual harassment policy in place, and this is given to the employee or worker.
 - 1.9 GSL Education will ensure that all staff are given training on sexual harassment, and this is monitored and done on a [quarterly] basis/ or regular training will be provided to all staff on sexual harassment.
 - 1.10 GSL Education will carry out due diligence checks on hirers/intermediaries who we engage in the supply of temporary agency workers to ensure that they are taking reasonable steps to carry out their duties as employers under the Equality 2010.another company are protected under this provision. This could apply to employment businesses and intermediaries that supply their own workers to a client/hirer.
-
- 2 All employees and workers will be expected to comply with GSL Education's policy on sexual harassment in the workplace. Any breach of such a policy will lead to appropriate disciplinary action.
 - 3 Employees who GSL Education finds to be responsible for sexual harassment will be subject to disciplinary procedures and the sanction may include termination.
 - 4 Temporary workers who GSL Education finds to be responsible for sexual harassment will be subject to GSL Education's complaints procedure even where such sexual harassment involves individuals who are not engaged by GSL Education.

Complaints and monitoring process

GSL Education has procedures for monitoring compliance with this policy and for dealing with complaints of sexual harassment in place. These can be sourced from GSL HR email: HR@gsleducation.com and will be made available immediately upon request. Any discrimination complaint will be investigated full.

COMPLAINTS POLICY & PROCEDURE

Policy Reference	GSL/POL/001.4
Last Updated	JUL 2024
Next Review	JUL 2025

General Complaints Procedure.....	2
Safeguarding or Candidate Suitability Complaints.....	4
Suitability Concerns.....	6
Policy Statement for Candidates who become unsuitable.....	7
Our Safeguarding and Child Protection Team	9

Complaints Policy

GSL Education is committed to providing a high-level service to our customers. If you do not receive satisfaction from us, we need you to tell us about it. This will help us to improve our standards.

General Complaints Procedure

Complaints about GSL

If you have a general complaint, please discuss it with your consultant in the first instance so that we can try to resolve your complaint informally. If needed, you can refer it to the relevant Branch Manager by email. Contact details can be found on our [website](#).

Next steps

1. The Branch Manager may invite you to meet to discuss and hopefully resolve your complaint. We will do this within 5 days.
2. If you do not want a meeting or it is not possible, the Branch Manager will send you a detailed reply to your complaint. This will include his/her suggestions for resolving the matter. He/she will do this within 5 days of completing their investigation.

If your complaint is not resolved to your satisfaction, please send your complaint in writing to our HR team: HR@gsleducation.com.

Next steps

1. We will send you a letter acknowledging your complaint and asking you to confirm or explain the details set out. You can expect to receive our letter within 3 - 5 days of us receiving your complaint.
2. We will record your complaint in our central register within a day of receiving it.
3. We will acknowledge your reply to our acknowledgment letter, and confirm what will happen next. You can expect to receive our response within 3 - 5 days of your reply.

4. We will then start to investigate your complaint. This will normally involve the following steps;
 - We may ask the member of staff who dealt with you, to reply to your complaint within 5 days of our request;
 - We will then examine the member of staff's reply and the information you have provided for us. If necessary, we may ask you to speak to them. This will take up to 4 days from receiving their reply.
5. Once your complaint is resolved we will send you a summary letter for your records.

At this stage, if you are not satisfied please contact **Kamal Ahmed**, CEO. You can write to him at: GSL Education, 1 Beauchamp Court, 10 Victors Way, Barnet, EN5 5TZ.

You can also write to the REC, our trade association of which we are a member, marked 'for the attention of the Consultancy and Compliance Team', REC, Dorset House, 1st Floor, 27 – 45 Stamford Street, London, SE1 9NT.

If we have to change any of the time scales above, we will let you know and explain why.

NOTE: In any event, we will comply with any statutory procedures that may relate to your complaint.

Safeguarding or Candidate Suitability Complaints

GSL Education is committed to providing high quality, fully vetted staff to our clients. If we receive information, evidence, or concerns are raised to suggest a candidate has become unsuitable for work, or that another colleague may be unsuitable to work we will report these concerns immediately to the client and follow the appropriate procedures to investigate and make referrals to the relevant bodies.

Safeguarding Concerns:

By law, it is everyone's responsibility to report any concerns relating to safeguarding and child protection. If you have any concerns that may suggest that a child is at risk of harm, however insignificant it may seem at the time, (see [Keeping Children Safe in Education – Part 1](#)); you should immediately report your concern to the **DSL** in the work setting (or the Headteacher if your concern relates to the DSL) and to your consultant at GSL who will inform the GSL DSO (**Sarah Andrews**, sarah.andrews@gsleducation.com or safeguarding@gsleducation.com). ** if you feel a child is at immediate risk of harm – dial 999 immediately and inform the DSL/DSO as soon as possible.*

This could be from your own observations, referral to you by another adult or a concern disclosed to you by a student.

- You will be asked to put your concerns in writing
- You should provide as much **factual** detail as you can (including dates, times, settings, names of witnesses, sequence of events)
- You should not make any attempt to investigate the issue yourself or provide opinions
- You should follow the Safeguarding and Child Protection policy within the work setting

**for concerns raised during remote online face-to-face or online tutoring, the same process should be followed and secure recordings may be accessed as part of the investigation process. Be vigilant and aware of signs and symptoms that may indicate abuse or neglect.*

During online or remote tutoring also be aware of the environment for learning, disclosures made during discussions or illustrated through learning tasks, online behaviours of students, any changes in behaviour that seem unusual and changes in attendance patterns.

Next Steps:

A: If a Consultant at GSL is informed of a concern either by a candidate or by a client:

1. Take a written statement or ask the complainant to put their complaint in writing
2. Ensure that the date and time that the concern was raised is recorded, as well as the date and time the concern was identified
3. Record whether the candidate or client has informed the relevant school safeguarding team and LADO, Police or other agencies
4. Inform the Branch Manager and DSO
5. If the referral relates to a candidate – do not discuss the nature of the referral without direction from the Branch Manager and DSO.
6. Follow instructions from Branch Manager and DSO with regards to the next steps (if neither are available, contact another Branch Manager)

B: If a concern is raised to the Branch Manager or DSO about a candidate on placement:

1. Agree with the client whether the candidate's placement should be suspended or terminated (this should not be an automatic response but should be discussed and agreed on a case by case basis).
2. **If the complaint meets the harm threshold and may lead to a criminal investigation:**
 - terminate the placement and inform the relevant LADO within 1 day, await instruction from the LADO.
 - Do not inform the candidate of the details of the complaint
 - Do not investigate
3. **If the complaint is unlikely to lead to a criminal investigation and does not pose immediate risk of harm*:**
 - consider suspending or terminating the placement (this should not be an automatic response but should be discussed and agreed on a case by case basis) and report the complaint to the relevant LADO within 1 day.
 - Inform the candidate that a complaint has been made, but do not disclose details.
 - Request a written report from the candidate, which will be shared with the client and the LADO.
 - Await instructions from the LADO

***if in any doubt about whether the incident meets the harm threshold – do not inform the candidate of the details of the complaint until the LADOs has provided guidance**

C: If a concern is raised by a candidate about a colleague:

1. Record the factual details of the complaint
2. Inform the Branch Manager and DSO
3. **If the complaint is about a colleague at a placement school** – inform the relevant client contact and they will investigate.
4. **If the complaint is about another candidate** – inform the relevant client contact and consider suspending or terminating their current placement if they have one. Follow the steps in section 'B'

Suitability Concerns:

GSL Education undertake checks with the DBS and Teaching Regulation Agency for all Teaching and Support Staff, prior to their engagement with schools and then at least yearly. If we receive

subsequent information or evidence that a candidate may have become unsuitable for work, we will take appropriate action.

If you have any reason to believe that you or anyone else may not be suitable to work in schools or as a tutor, you must report your concern to your Consultant, Branch Manager or DSO. This could be due to:

- Expired qualification documents
- Expired right to work
- New criminal convictions
- Current investigations
- Behaviour deemed inappropriate
- Information provided to us by third parties such as the police, DBS or TRA

Next Steps:

1. Consultant receives information or evidence that a candidate has become unsuitable
2. Inform Branch Manager and DSO (if neither are available – inform another Branch Manager or Director)
3. Follow instructions from Branch Manager/Director and DSO
4. If information/evidence are confirmed, the client and candidate will be informed immediately, and the placement will be terminated. (see below ***Policy Statement for Candidates who become unsuitable***)
5. Where appropriate necessary documentation will be updated to reinstate suitability
6. Where appropriate reports will be made by the DSO to the relevant LADO, TRA, DBS, DfE

For more information on the procedures followed by the TRA see: [Teacher misconduct: Disciplinary procedures for the teaching profession](#)

For more information on when and how to make a referral to DBS visit:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

**Prohibition Orders*

'A prohibition order means that the person concerned is not allowed to undertake unsupervised teaching work in schools or the other listed settings. Where an individual is prohibited, their details will appear on the Prohibited List. A prohibition order is likely to be appropriate when the behaviour of the person concerned has been fundamentally incompatible with being a - +teacher. The primary purpose of a prohibition order is to protect pupils, maintain public confidence in the teaching profession and uphold proper standards of conduct, referred to as public interest. A prohibition order is a lifetime ban, though

in some circumstances the teacher may be able to make a request to have it reviewed after a specified period of time.' For more information visit: <https://www.gov.uk/government/organisations/teaching-regulation-agency>

Policy Statement for Candidates who become unsuitable

GSL Education has a responsibility to act if a candidate becomes unsuitable for employment whilst on placement.

If we receive or obtain information which indicates that a candidate is no longer suitable for their current position, we will immediately:

- undertake relevant investigation
- inform the client of the new information and the investigations that are taking place
- if necessary, end the placement
- take all reasonable steps to offer a suitable replacement candidate
- where necessary inform relevant authorities (Disclosure and Barring Service, Local LADO, DfE etc)

Unsuitability of Permanent Candidates

If, within three months from the date of introduction of a candidate to a client (i.e. the date the candidate starts working for the client) we receive or obtain information which indicates that the candidate is or may be unsuitable for that position, we will inform the client without delay (i.e. on the same day, or the next business day if that is not reasonably practicable). For example: if we take up a reference or otherwise hear of information that would make the candidate unsuitable, we will inform the client.

If necessary, we will end the placement and take all reasonable steps to offer a suitable replacement.

Unsuitability of Temporary Candidates

Where we receive or obtain information during the course of a placement that gives us reasonable grounds to believe that a candidate supplied to a client is unsuitable (see above) we will inform the client without delay and end the placement.

If the information only indicates that the candidate may be unsuitable but is insufficient to give us reasonable grounds to believe that s/he is in fact unsuitable; we will commence such enquiries as are reasonably practicable and inform the client of the information received and the enquiries being made. If, as a result of those enquiries, we have reasonable grounds to believe s/he is unsuitable, we will then without delay inform the client and end the placement.

We will take all reasonable steps to offer a suitable replacement.

Unsuitability and the Data Protection Act

The sort of information that might indicate a candidate is unsuitable will depend on the circumstances but may be: a relevant criminal conviction that should have been disclosed; qualifications found to be false; or a medical condition that means the candidate may either be at risk by performing the work or s/he may be placing others at risk. It should be information that would mean we would not have put the candidate forward in the first place and must be more than hearsay.

It is likely that processing of data to comply with regulation 20 will have a lawful basis under the General Data Protection Regulation (GDPR). Article 6 of the GDPR sets out that processing will be lawful based on 6 possible bases, including where it is “necessary for compliance with a legal obligation to which the controller is subject” and where it is “necessary for the purposes of the legitimate interests pursued by the controller or a third party” (although there are exceptions to the latter of these).

It is likely that as we are processing the data to comply with the Conduct Regulations this will be a sufficient legal obligation, but there is also a point to be made that the processing of this data is in our client’s legitimate interest, as it will affect their engagement of the individual.

However, we will be careful to check the accuracy of any information we receive as the communication of any false or misleading information prejudicial to the candidate could give rise to a possible claim for damages for defamation. We will therefore ensure that if this situation does arise, that we will not disclose more information to the client than is necessary. It may be sufficient where we have supplied a temporary candidate to simply state that “the candidate is being withdrawn pending” investigations into their suitability without stating what the allegations are.

Reporting Concerns

If you have concerns please contact our Designated Safeguarding Officer:

Sarah Andrews

0203 8730 565

07903957036

sarah.andrews@gsleducation.com

or

safeguarding@gsleducation.com

Please see our full Complaints Policy for further, detailed information on identifying and reporting concerns.

Continued Suitability Policy

Repeat Checks for regular Workers

Update Service checks: every 12 months (subject to any shorter period imposed by a client)

CV Check: every 12 months

Reference: Candidates should have at least one educational reference that is valid at **all** times.

Feedbacks: Get feedback if candidate completes a LT placement

If a candidate is working actively for GSL for the past 6 months (supply and LT) then we can accept references that are 12 months old. However, it is important we obtain references/feedback from schools where candidates work regularly.

Non-active Workers (3 – 6 months not working)

Check the following is up to date:

DBS & Update Service

Professional Checks

‘Right to work’ documents

Reference from the time gap

Please note that references expire after 6 months if candidates are inactive

Non-active Workers (12 months not working)

Must carry out a full 're-registration'

GSL - REFERENCE POLICY

Policy Reference	GSL/POL/028.2
Last Updated	September 2024
Next Review	September 2025

This policy sets out GSL Education's commitment to ensuring that appropriate background checks are completed for all candidates, in all roles, in terms of employment history and references. This policy and related procedures are in line with legal requirements sited in the Conduct Regulations 2003, DfE guidance sited in the Keeping Children Safe in Education document and our auditors' requirements (Recruitment and Employment Federation - REC and Crown Commercial Supplier Framework).

Employment History requirements sited in **Keeping Children Safe in Education** (updated September 2024):

- full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment

Referencing requirements sited in the **Conduct Regulations 2003**:

- Regulation 22 refers to the additional measures that must be taken when work-seekers will be working with vulnerable persons. The Conduct Regulations provide that 'vulnerable' includes people who are young, elderly, infirm or under the age of 18.

- These additional measures give a requirement to *obtain two references* for work-seekers.
- Where two references are not obtainable, *the efforts that have been made* to obtain the references should be documented. This must be *shared with the hirer*, and they can be presented with the choice of hiring them regardless.

Referencing requirements sited in **Keeping Children Safe in Education**:

227. The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools and colleges *should obtain references before interview*, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.

228. Schools and colleges should:

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

Referencing requirements of **REC Audited Education**:

- REC seek assurance that at least two written references are followed up in all cases, including previous agencies/local authorities with whom the work-seeker may have worked.
- Provide a written statement of the reference policy

Referencing requirements of **Crown Commercial Suppliers Framework**:

- Whilst REC Audited Education requires two written references to be in place, the framework additionally requires that these cover the last two years as laid out in paragraph 12.3.5 in the Framework Schedule 1 (Specification).
- As well as carrying out checks in line with the Audited criteria, REC will check at audits that the written reference policy confirms that references will be obtained to cover the last two years. Where this is not the case, it has been agreed that REC will inform CCS.

Prior to Interview – at Registration

Employment History will be reviewed via CV covering at least 10 years or since leaving school (including all education, employment and voluntary work). Any gaps longer than one month will require explanation and relevant evidence.

The CV will be used to determine the required references, a list of which will be included in the Registration email sent to the candidate prior to interview.

Where possible, references will be requested at registration and prior to interview, so that any discrepancies or concerns can be discussed.

GSL Education Reference criteria:

- A minimum of **2 professional reference** requests will be sent and written references **received** for each candidate.
- References should aim to cover the candidate's **most recent 2-year work history**, including agencies and local authorities.
- **If there is a career gap**, this will be discussed with the candidate to find out the reasons as to why they have not been working. We will request a hospital letter, or a letter from the job centre to confirm unemployment if applicable, and a professional character reference to ensure all gaps are covered. (For CCS candidates all employers from the last 2 years will be approached for references and evidence of actions taken will be retained)

- References must include the **most recent employer**
- References must include the **most recent relevant employer/experience**
- If they haven't worked as a teaching staff in the last 2 years but have worked in the past, we will still obtain referee details from their most recent previous education employer.
- We will check with the school, college or local authority at which they were most recently employed to **confirm details of their employment, reasons for leaving and whether there were any safeguarding or disciplinary concerns raised.**
- If the candidate is not currently employed as teaching staff, we will still obtain referee details from their current/most recent employer.
- **Where satisfactory references cannot be obtained**, records will be kept detailing the actions that have been taken, and potential hirers will be informed, so that they can make an informed decision as to whether to continue with the booking.
- **Where concerns are identified**, the branch manager and (where relevant) the DSO will be informed, so that a considered decision can be made as to whether to continue with the appointment of the candidate. Concerns will be referred to the relevant authorities if required.

We may ask candidates to assist us with following up reference requests, however, we will not rely solely upon them to obtain references.

Invigilator References:

Due to the unique nature of the role, the references required for invigilators are as follows:

- **Minimum of 2 written references** (covering a minimum 1 month employment each)
- 1 must be **most recent employer**
- **If references do not cover 1 month each**, character references will be required covering the last 2 years (this must be from a professional and not immediate family).
- **Relevant references are preferred**

Reference quality requirements:

We will always make every effort to obtain the best possible calibre of references from all candidates.

A full set of written references that meet the minimum requirements should be returned and checked before the candidate is sent out to work.

In all situations where the required references cannot be obtained, a decision will be made as to whether the candidate is suitable for employment.

For all candidates with limited references, clients will be informed and asked to complete a disclaimer to evidence their decision to continue with the booking. In these situations, feedback forms will be requested from the booking.

- Employment references should be from a **senior member of staff, or endorsed by one**
- Education references should be from a **senior member of staff or endorsed by the Head teacher**
- **References must include dates of employment**, and state whether there were any **safeguarding or disciplinary issues**. (We will follow up on any instances where the candidate 'requires improvements or is inadequate' unless already stated.)
- **Educational references must include the reason for leaving**
- Referee emails should be a **professional email address** (not from a personal email address), and must be received from a **verifiable source** e.g. on headed paper or with an email signature.
- Any references received by post or fax should include the referee signature or official stamp.
- We will not accept **open references** unless they are **confirmed/endorsed** to us from a verifiable source. Evidence of this endorsement will be kept on file with the original reference.
- Character referee details must **not be from family members** and should be from a professional.
- We will ensure that the **dates on the reference form, match up with the candidate's CV**. If there are any discrepancies, this will be queried with the referee and candidate to clarify. If no dates have been provided on the reference form, we will contact the referee again to confirm.
- If the Teacher is an **NQT/ECT**, we will request a reference from their **most recent school placement**.
- For candidates who have been employed **overseas for 6 months or more within the last 5 years**, references will also be **requested for these placements**. These references must meet the same criteria as those from within the UK.
- When obtaining references from other **agencies**, we send an agency reference form to the agency requesting basic information, including the date of registration, approx. number of days worked, if they are aware of any reason why the candidate would not be suitable for working with children, and if the candidate is still working through them.
- We **cannot accept** 2 agency references only, for one candidate.

References will be saved in the CRM along with any relevant communication and we will shred all paper that is no longer required in office (once everything has been scanned).

As stated in the Conduct Regulations, we are required to show copies of references to clients if requested.

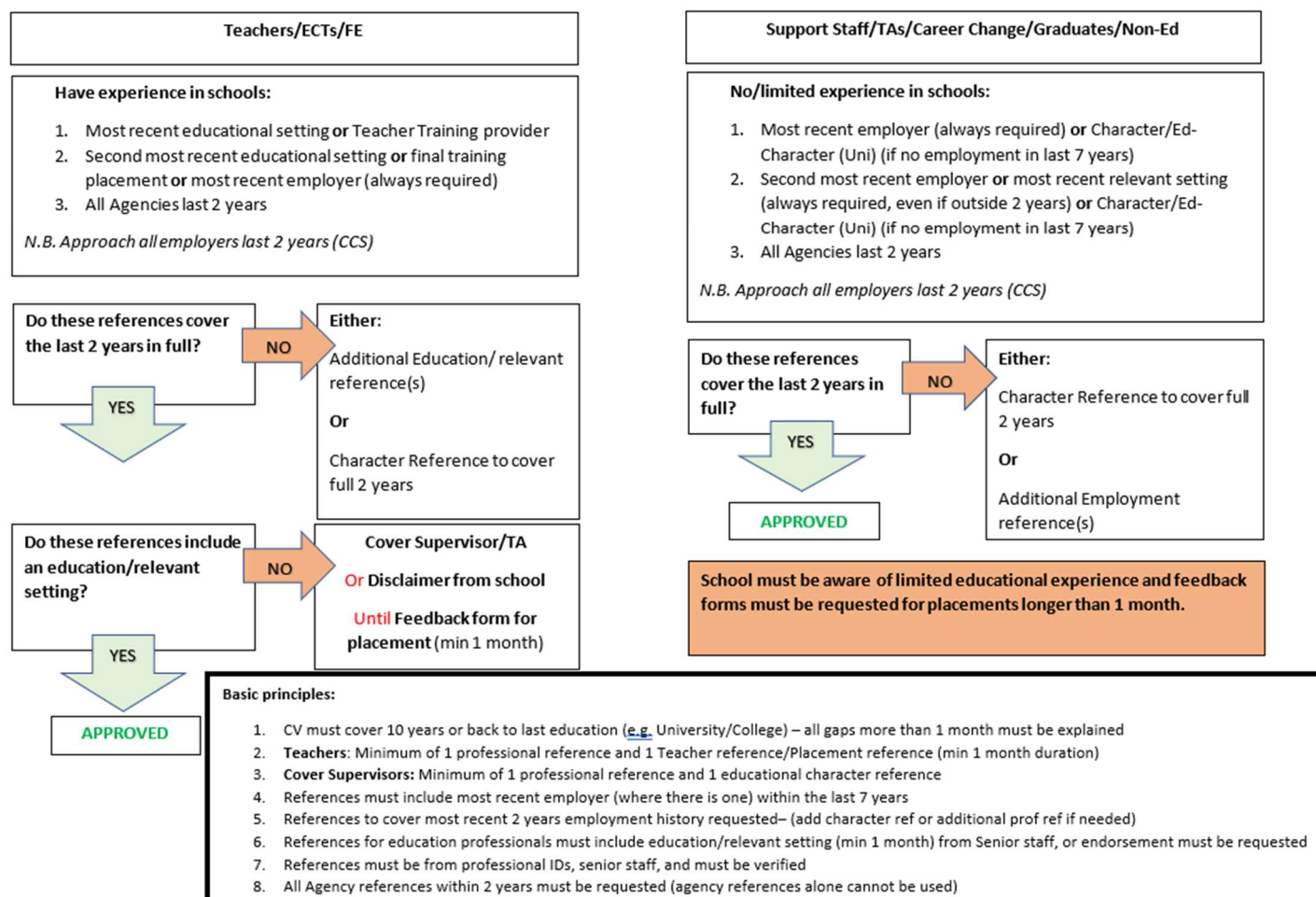
When does a reference expire?

If a candidate is working actively for GSL for the past 6 months (supply and LT) then we can continue to apply references that are 12 months old. However, it is important we obtain references or feedback forms from schools where candidates work regularly. For candidates that work irregularly we can obtain references from other agencies, new/additional employers, or a character reference (character references must not be from family members).

Candidates should have at least one educational reference that is valid at all times.

References do expire after 6 months if the candidate is inactive.

Reference policy at-a-glance:



Assessing references for different roles:

	Teacher/ECT/FE/OTT	Experienced Cover Supervisor/ Experienced Teaching Assistant	Graduate/New Teaching Assistant/Non-class /Overseas	Invigilators
Great - Online	<ul style="list-style-type: none"> Current/most recent education setting /placement (senior staff or endorsed) 2nd Education setting/placement (senior staff or endorsed) References cover full 2 years All Agency references 	<ul style="list-style-type: none"> Current/Most recent Education setting (senior staff or endorsed) 2nd Education setting (senior staff or endorsed) References cover full 2 years All agency references 	<ul style="list-style-type: none"> Current/most recent employer Education setting/ Educational Character ref (Uni) References cover full 2 years All agency references 	<ul style="list-style-type: none"> Current/most recent employer Education setting/ Educational Character ref (Uni) References cover full 2 years All agency references
Good - Online	<ul style="list-style-type: none"> Current/most recent education setting /placement (senior staff or endorsed) 2nd Education setting/ placement/relevant sector (senior staff or endorsed) Character Reference 2 years All Agency references requested 	<ul style="list-style-type: none"> Current/Most recent Education setting (senior staff or endorsed) Most recent Employer/relevant sector (verified) Character Reference 2 years All Agency references requested 	<ul style="list-style-type: none"> Current/most recent employer Previous employer/ work experience placement Character Reference 2 years All Agency references requested 	<ul style="list-style-type: none"> Current/most recent employer Previous employer/ work experience placement Character Reference 2 years All agency references requested
Minimum – Online (in this role)	<ul style="list-style-type: none"> Current/most recent education setting /placement (senior staff or endorsement requested) Character reference 2 years All Agency references requested 	<ul style="list-style-type: none"> Current/Most recent Education setting (senior staff or endorsement requested) Character reference 2 years All Agency references requested 	<ul style="list-style-type: none"> Character reference 2 years Agency reference/character reference All Agency references requested 	<ul style="list-style-type: none"> Character reference 2 years Agency reference/Character reference All Agency references requested
Minimum – Online with notes/ adjustments	<ul style="list-style-type: none"> No education references in 7 years/agency only Character reference 2 years <p><i>*Candidate type must be Class Support - Cover Supervisor or Teaching Assistant until improved references on file</i></p>	<ul style="list-style-type: none"> No UK/verifiable education setting references/agency only Character reference 2 years <p><i>*Candidate type must be Class Support – consider Teaching Assistant only until improved references on file</i></p>		
Weak - disclaimer– tell the school, get feedback (min 1 month)	<ul style="list-style-type: none"> No education references/agency only Current/most recent employer/education setting reference not available References identify weaknesses/performance concerns 	<ul style="list-style-type: none"> Current/most recent employer/education setting reference not available References identify weaknesses/performance concerns 	<ul style="list-style-type: none"> Agency only Current/most recent employer/education setting reference not available 	<ul style="list-style-type: none"> No references available Current/most recent employer/education setting reference not available

Model Policy Name:	Whistleblowing Policy
Created Date:	March 2023
Last Updated Date:	Sep 2024
Next Review Date:	Sep 2025
Policy No.:	GSL/POL/030.3

1. INTRODUCTION

- 1.1 GSL Education is committed to conducting its business with honesty and integrity and aims to achieve the highest possible standards of service and ethical standards in all of its practices.
- 1.2 We expect all staff to maintain the same high standards too; however, all organisations face the risk of things going wrong and sometimes malpractice and wrongdoing can take place. We take malpractice and wrongdoing very seriously and aim to prevent and eliminate any wrongdoing or malpractice within the organisation.
- 1.3 We encourage open communication from all those who work for us and we want everyone to feel secure about raising concerns therefore encourage all staff to raise any concerns they may have about malpractice or wrongdoing within the organisation freely and without fear of suffering a detriment or dismissal to enable us to eliminate and prevent wrongdoing or malpractice within the organisation.
- 1.4 All staff have protection under whistleblowing laws if they raise concerns in the correct way. This policy is designed to give staff that opportunity and protection. It does not matter if an individual who raises a concern is mistaken about it—staff do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice
- 1.5 We will treat any concerns raised seriously and will protect and support any individual who makes a disclosure in line with this policy.
- 1.6 This policy does not form part of any contract; GSL Education reserves the right to amend this policy at any time without prior notice.

2. WHO CAN RAISE A CONCERN UNDER THIS POLICY?

- 2.1 This policy applies to all current and former employees, workers, officers, consultants, contractors of our business, including home workers, trainees, apprentices, agency workers, casual workers and limited company contractors.
- 2.2 No qualifying length of service is required in order to raise a concern under this policy.

3. WHEN TO USE THIS POLICY

- 3.1 This policy should be used to report concerns of malpractice or wrongdoing in relation to our organisation's activities where you have information which you reasonably believe tends to show one or more of the following:
 - that a criminal offence has been committed, is being committed or is likely to be committed; or

- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject or
- that a miscarriage of justice has occurred, is occurring or is likely to occur; or
- that the health or safety of an individual has been, is being or is likely to be endangered; or
- that the environment has been, is being or is likely to be damaged; or
- that any of the above malpractices have been, are being or are likely to be deliberately concealed. This applies whether the malpractice has already occurred, is currently in progress, or is likely to happen in the future.

3.2 You must reasonably believe that the disclosure is being made in the public interest.

3.3 It doesn't matter if you are mistaken about your concern but you must have information that tends to show some malpractice or wrongdoing rather than an opinion or a feeling.

4. DISCLOSURES THAT ARE NOT COVERED BY THIS POLICY

4.1 You will not qualify for protection under this policy if you commit an offence in making the disclosure, or if you disclose a matter that is subject to legal, professional privilege (for example, correspondence between GSL Education and our lawyers regarding a specific case).

4.2 If your concern relates to your own treatment as an employee of GSL Education, including personal circumstances at work, you should raise it under our grievance procedure instead, unless you reasonably believe that the matter is in the public interest.

4.3 If your concern relates to your own treatment or personal circumstances at work but you are not an employee of GSL Education, you should use our complaints procedure instead of the grievance procedure.

Please check for more information in our **Complaints Policy & Procedure**.

4.4 If you wish to raise a concern of suspected malpractice or wrongdoing in relation to a hirer's activities you may need to raise the concern directly with the hirer instead.

4.5 Any other concerns about our services generally which are not related to the types of wrongdoing or malpractice covered by this policy should be raised using our complaints policy instead.

5. HOW TO RAISE A CONCERN

5.1 If you have any concerns of the types of malpractice or wrongdoing covered by this policy, you should in the first instance make a disclosure to your immediate superior. Agency workers should disclose concerns to the consultant who is responsible for managing their assignment.

5.2 If, for any reason, you feel that you cannot tell your immediate superior, or in the case of an agency worker the consultant responsible for managing your assignment, you should raise the issue with **Sarah Andrews**, Compliance Manager & DSO, sarah.andrews@gsleducation.com.

5.3 If you have made a disclosure and are still concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with the following member of management: **Kamal Ahmed**, CEO, kamal.ahmed@gsleducation.com.

- 5.4 A disclosure of a concern can be made by telephone, in person or in writing (including by email). However, it is preferable for the disclosure to be made in writing so that we can keep an exact record of your concern.
- 5.5 You are not expected to prove the truth of your concern beyond reasonable doubt or provide any evidence; however, you will generally need to provide the following information as a minimum:
- the nature of the concern;
 - why you believe it to be true;
 - the background and history of the concern; and
 - relevant dates where possible.
- 5.6 You can raise any concerns anonymously; however, we encourage you to give your name when reporting your concern wherever possible because it may be more difficult for us to protect your position or give you feedback on the outcome of investigations if you choose to remain anonymous. If you choose to remain anonymous, we will preserve your confidentiality unless the law requires otherwise. We will only make disclosures to third parties or other staff with your consent.
- 5.7 You may wish to consider discussing your concern with a colleague before raising it formally under this policy. You can also choose to raise a concern under this policy alone or with a colleague; however, it is in the interests of all parties to maintain confidentiality once you have raised a formal concern.

6. HOW WE RESPOND TO CONCERNS RAISED UNDER THIS POLICY

- 6.1. We are committed to ensuring that all disclosures raised in accordance with this policy will be dealt with objectively, consistently, fairly and professionally.
- 6.2. We will take the time to listen to any issues raised and arrange a meeting as soon possible to discuss your concern (unless the concern has been raised anonymously). The aim of the meeting will be to establish the background and facts in order to help us decide whether and how to carry out any subsequent investigation. We may ask you for further information about the concern raised, either at this meeting or at a later stage.
- 6.3. **Any concerns you raise in line with this policy** will be recorded in our *Central Database*.
- 6.4. After the meeting, we will decide how to respond. This will usually involve making internal enquiries in the first instance, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. We will endeavour to complete investigations within a reasonable time.
- 6.5. We will keep you informed of the progress of the investigation as it is carried out and when it is completed, and give you an indication of the timescale for any actions or next steps that we may take. We cannot inform you of any matters that would breach any duty of confidentiality owed to others.
- 6.6. We will consider any concerns raised anonymously at our discretion, taking into account factors such as the seriousness of the issue raised, the credibility of the concern and the likelihood of confirming the allegation from other sources. However, concerns that are expressed completely anonymously are much less powerful and are difficult to investigate. It may also be difficult for us to provide you with feedback if you cannot be contacted.
- 6.7. If disciplinary or other proceedings follow the investigation, we may need to ask you to come forward as a witness to help us take appropriate action to end the wrongdoing.

7. CONFIDENTIALITY

- 7.1 All concerns raised will be treated as confidential and every effort will be made not to reveal the identity of any individual who raises a concern. Unless the law requires otherwise, we will only make disclosures to third parties or other staff with your consent.

8. RAISING YOUR CONCERN EXTERNALLY (EXCEPTIONAL CASES)

- 8.1 The main purpose of this policy is to give all our staff the opportunity and protection they need to raise concerns internally. We would expect that in almost all cases raising concerns internally would be the most appropriate course of action in order to resolve the issue.
- 8.2 However, if for whatever reason you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true and in the public interest, the law recognises that it may be appropriate for you to raise the matter with another approved person, such as a regulator, professional body, or an MP. A list of the relevant prescribed people and bodies that you can raise a concern with is available on the GOV.UK website via [this link](#):
- 8.3 We strongly encourage individuals to seek appropriate advice before reporting a concern to an external person. [Protect](#) (formerly known as Public Concern at Work) is the UK's whistleblowing charity and aims to stop harm by encouraging safe whistleblowing. It is a source of further information and advice. They operate a confidential helpline. ACAS also operate a free confidential helpline that you can contact for advice. The contact details for both organisations are set out in the information and contacts section under paragraph 10 below.

9. PROTECTION AND SUPPORT FOR THOSE RAISING CONCERNS

- 9.1 We hope that all staff will feel able to voice their concerns freely under this policy.
- 9.2 *GSL Education* is committed to good practice and high standards and to being supportive of staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.3 Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If you believe that you have suffered such treatment, you should inform **Sarah Andrews**, Compliance Manager & DSO, sarah.andrews@gsleducation.com immediately.
- 9.4 *GSL Education* will not tolerate any harassment or victimisation of individuals who raise concerns about wrongdoing or malpractice in the workplace. No member of staff may threaten or retaliate against an individual who has raised a concern. Any person involved in such conduct may be subject to disciplinary action.
- 9.5 To ensure the protection of all our staff and the integrity of our business, those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or not made in the public interest may also be subject to disciplinary action.
- 9.6 If you are not happy with the way in which a matter has been addressed or dealt with you should raise it formally using our complaints procedure. Employees of *GSL Education* can use our grievance procedure to address the issue instead.

10. FURTHER INFORMATION AND CONTACTS

- 10.1 If you have any queries about the application of this policy, please contact **Sarah Andrews**, Compliance Manager & DSO, sarah.andrews@gsleducation.com in the first instance.

- 10.2 Protect is a source of further information and advice. It also provides a free helpline offering confidential advice on 020 3117 2520. Further information is available on their website at <https://protect-advice.org.uk/>.
- 10.3 The Advisory, Conciliation and Arbitration Service (ACAS) also has a free helpline that you can contact for further advice. The ACAS telephone number is: 0300 123 1100 and the helpline is open Monday to Friday from 8am to 6pm. The website can be found here: www.acas.org.uk.
- 10.4 If you are a member of a recognised trade union, you can also seek information and advice from your trade union representative.

RECRUITMENT, SELECTION AND VETTING POLICY

Policy No	GSL/POL/033
Last Updated	Jan 2025
Next Review	Oct 2025

Introduction

GSL Education is an employment business supplying temporary workers to work within the education sector. The work seekers that we engage must pass thorough and robust vetting procedures before we can consider them for any placement or assignment with our clients and this policy sets out our commitment to comply with the highest standards at each stage of the recruitment process.

Our processes are compliant with relevant legislation and the Department for Education's statutory guidance: **Keeping Children Safe in Education**. We ensure our temporary workers remain compliant throughout their time with GSL Education by undertaking the checks set out in this policy.

We have processes in place whereby we obtain feedback from our clients once placements are made.

Recruitment and Selection

Face to face interviews

Before placing any work seekers on assignments, GSL Education meets with them face to face either in person or via video. In order to conduct a video interview and document checking candidates must either have passed a digital ID check via Trust ID (UK and Irish citizens) or an Online Right to Work check (Non-UK citizens) Before meeting the work seeker, we ask them to forward a copy of their CV and advise them of the documentation they are required to forward to us or bring with them to the interview.

During the interview, a trained consultant will assess the work seekers suitability for the role by discussing their previous work history and qualifications. GSL Education uses a template of standard relevant questions to ensure equality of approach and seek to understand the work seekers knowledge and understanding of protocols and to assess how they would react to various scenarios.

Provided the outcome of the interview is satisfactory, **GSL Education** will then start the pre-employment checks.

Right to work checks

GSL Education conducts right to work checks on every work seeker we intend to supply to our clients to comply with immigration requirements, recruitment industry legislation and to ensure that we guard against the risk of supplying a person who is not permitted to work, to a client. All checks are carried out in line with best practice and equality law. We will conduct **a physical document check** or **an online check** to establish a candidate's right to work. Where a right to work check is conducted using Digital ID Verification or the online service, the information is provided in real-time, directly from Home Office systems and so there will be no requirement to see the documents listed below.

Physical right to work checks

For physical document checks we follow the three-step process set out in the [Home Office Guidance: An employer's guide to right to work checks](#):

- **Step one:**

We **obtain** the work seekers original documents. The work seeker must provide us with either one document from LIST A of the [Home Office right to work checklist](#) or any of the documents or combination of documents from LIST B of the checklist. We only accept original documents. Photocopies or electronic scans are not acceptable.

- **Step two:**

We take reasonable steps to check that the document is valid and that the work seeker is the person named in the document.

For each document we complete the following checks:

- check any photographs are consistent with the appearance of the work seeker;
- check any dates of birth listed are consistent across documents and that we are satisfied that these correspond with the appearance of the work seeker;
- check that the expiry date for permission to be in the UK has not passed;
- check that the documents are valid and genuine, have not been tampered with and belong to the holder; and
- if given two documents which have different names, we ask for a further document to explain the reason for this. The further document could be a marriage certificate, a divorce decree absolute, a deed poll or a statutory declaration.
- check that in relation to restrictions on permission to work in the UK the work seeker is allowed to do the type of work they have applied for. For students, we will obtain a copy of their academic term times from the relevant institution.

- **Step three:**

We make a copy of the relevant page/s of the document in a format which cannot be subsequently altered. This can include a photocopy or a scan or where we take an electronic copy, this will be in a non-rewritable format.

Where the work seeker has provided us with a passport, we will photocopy or scan the following: any page with the document expiry date, the holder's nationality, date of birth, signature, leave expiry date, biometric details, photograph and any page containing information indicating that the holder has an entitlement to enter or remain in the UK and undertake the work in question.

For all other documents, we make a clear copy or scan of the document in full, including both sides of a Biometric Residence Permit.

All copies of documents taken will be kept securely for the duration of the work-seekers engagement with **GSL Education** and for two years afterwards. The copy will then be securely destroyed.

We will make a note of the date on which the check was conducted by either a declaration on the hardcopy or on a separate record

Online right to work checks

For online right to work checks we will follow the three basic steps set out in the [Home Office Guidance: An employer's guide to right to work checks](#):

- **Step one:**

We use the Home Office online right to work checking service with a valid share code in respect of an individual and will only employ the person, if the online check confirms they are entitled to do the work in question;

- **Step two:**

We satisfy ourselves that any photograph on the online right to work check is of the individual presenting themselves for work; and

- **Step three:**

We retain a clear copy of the response provided by the online right to work check (storing that response securely, electronically or in hardcopy) for the duration of employment and for two years afterwards. The copy will then be securely destroyed.

ID checks and proof of address

In addition to the above right to work documents, we also require the work seeker to provide us with two documents to confirm their identity and proof of address. The type of documents that we accept are: driving license, utility bill, bank statement, government document/letter which includes the work seekers national insurance number.

Copies of documents will be taken and noted with the date the documents were checked. Copies will be kept securely for the duration of the work-seekers engagement with GSL Education and for at least 1 year after. The copy will then be securely destroyed.

References

In accordance with Regulation 22 of the Conduct of Employment Agencies and Employment Businesses Regulations 2003 (and the terms of the Crown Commercial Service (CCS) Framework), we require (at least) two references that must cover the previous two years of employment for all work seekers. One reference must

be from the work seekers' current or most recent relevant employer. References must be from non-family members who give their consent for the reference to be forwarded to our clients. (please refer to our Reference Policy for full details)

We will verify all references by contacting the referees directly, either by telephone or email.

Verbal references will be recorded, and a copy of the record will be sent to the referee via their professional email address to obtain their written confirmation that the record is correct and their consent to forward it to a third party.

Open references may be accepted, provided that they can be verified and include the following information:

- the dates between which the work seeker worked for or with the referee;
- the role the work seeker undertook;
- whether the work seeker is deemed suitable to work with children;
- whether the referee would re-employ the work seeker; and
- whether the work seeker was subject to any disciplinary action and the circumstances, if any.

References from other employment businesses must, as a minimum, include dates of employment and details of any safeguarding issues if they are known.

Vetting

Rehabilitation of Offenders Act Declaration

During the registration process, all work seekers are required to complete our Rehabilitation of Offenders Act Declaration and, as required for regulated sectors, disclose all spent and unspent convictions, subject to the filtering rules.

If a work-seeker discloses any convictions, **GSL Education** may consult with the Teaching Regulation Agency, or for Wales, the Education Workforce Council, and the REC's legal helpline to obtain advice and guidance on whether the work seeker can work in the education sector. Our Designated Safeguarding Officer will make a decision as to whether the work-seeker can be recruited and whether a risk assessment is required.

Rehabilitation of Offenders Policy

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order and using criminal record checks processed through the Disclosure and Barring Service (DBS), **GSL Education** complies fully with the [DBS code of practice](#) and undertakes to treat all applicants for positions fairly.

GSL Education undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

GSL Education can only ask an individual to provide details of convictions and cautions that **GSL Education** are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended), and where appropriate (Police Act Regulations as amended),

GSL Education can only ask an individual about convictions and cautions that are not protected.

GSL Education is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical/mental disability or offending background.

GSL Education has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process.

GSL Education actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.

GSL Education select all candidates for interview based on their skills, qualifications and experience.

GSL Education ensures that all staff of GSL Education who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

GSL Education also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, GSL Education ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment/assignment.

GSL Education makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

GSL Education undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment

Disclosure and Barring Service and Update Service checks

GSL Education requires all our work seekers to have an enhanced Disclosure and Barring Service (DBS) check which includes a check on the Children's Barred List.

We view and take a copy of the original DBS certificate and, with consent from the work seeker, carry out a status check on the DBS Update Service. We record details of the check and the date the check is undertaken on the work seeker's file. If the Update Service check states that there is new information, we will require the work seeker to apply for a new DBS certificate before proceeding with their registration.

If a work seeker wishes to register with GSL Education and they are not already on the Update Service, a new DBS check will be required, and we would encourage the work seeker to subscribe to the Update Service. If they do not subscribe to the Update Service, we will require a new DBS check to be undertaken at least once a year.

GSL Education will undertake repeat status checks on the Update Service at least once a year, or more often if required by our clients, but no more than four times a year. We always obtain the work seeker's consent to undertake a status check.

If the DBS check shows details of a conviction or caution, in line with the Rehabilitation of Offenders Act 2014, we must provide a copy of the DBS to the school.

Following the decision of the Department for Education to remove access to the stand-alone Barred List checking system for employment businesses from 1 April 2021, we cannot conduct this standalone check and

we will not place any work seekers in a role without a full enhanced DBS check being completed. This check includes a Barred List check.

When reviewing a work seeker's DBS certificate, GSL Education will check that the certificate is for Child Workforce only and status checks on the Update Service will only be for Child Workforce. (Unless the work-seeker intends to work with vulnerable adults in a relevant role.)

The definition of 'work with adults', as set out in the Police Act 1997 (Criminal Records) Regulations is narrower than the definition of 'work with children' and refers to providing personal care to the adult. It is, therefore, not always the case that we will be entitled to view information relating to the adult barred lists. If there is any uncertainty as to whether a particular role is eligible for a criminal record check, we can use the [DBS eligibility tool](#) and, if necessary, obtain guidance from the DBS.

If a particular role is not eligible for an enhanced check against both the child and adult barred lists, we must not proceed with the check and if the work seeker has an existing DBS certificate covering both child and adult workforce, we will require them to undertake a new DBS for child workforce only.

Overseas Police Checks

All work seekers who have lived and worked in a single overseas country for six months or more in the last five years must provide an overseas police check. This will be done in accordance with the [Government Guidance](#) particular to each country.

If the work seeker is unable to provide a police check from the relevant country (for example, if the relevant country does not provide police checks), **GSL Education** may accept a letter of good conduct from the work seeker's previous employer within the relevant country. We would require the statement to include confirmation that, to the best of their knowledge, the work seeker has no criminal convictions and that they know of no reason why the work seeker should not work with children.

If we are unable to obtain a police check or a letter of good conduct, we will not proceed with the registration of the work seeker.

Letter of professional standing for work seekers that have lived or worked overseas

For work seekers seeking teaching roles, that have lived or worked overseas, **GSL Education** will request sight of a letter of professional standing issued by the professional regulatory authority where the individual worked. This check is completed to confirm the work seekers suitability for the role in line with **GSL Education** obligations under the Conduct Regulations.

Where the letter cannot be obtained and all reasonably practicable steps have been taken to obtain it, **GSL Education** will request the work seeker to provide an alternative document which confirms their suitability for the role. This may be a letter of good standing from the head teacher in the school that they worked in or additional professional references. In such a case where the letter of professional standing cannot be obtained, **GSL Education** may also refer to the Teaching Regulation Authority [Country Evidence table](#) for guidance on what other document/s might confirm suitability.

GSL Education will then inform the client of the steps taken to comply with the suitability requirements which are set out in Regulation 22 of the Conduct Regulations.

Qualifications and Early Career Teachers (ECTs)/Newly Qualified Teachers (NQTs)

Where the client, legislation or any professional body requires the work seeker to have a particular qualification or authorisation to work in the position offered by the client, we will obtain copies of original qualifications and authorisations and these will be available to our clients upon request.

Under the Education (School Teacher's Qualifications) (England) Regulations 2003, work seekers being supplied into a teaching position must be qualified to teach. In addition to checking the qualifications, we will also check the teacher's qualified teacher status via the Teacher Regulation Agency online portal. Please see further details below.

Where possible, we will check overseas qualifications via the [UK's National Recognition Information Centre](#) or the [UK National Information Centre \(ENIC\)](#)

Wherever possible we will work with schools and ECTs/NQTs to find suitable induction placements. In England, an ECT is required to complete 6 full school terms. In Wales NQTs must complete 3 school terms but this can be done by working 380 sessions (a session is equivalent to either a morning or afternoon of teaching).

Where a work seeker has completed their Teacher Training in the UK, but not completed their required induction period within 5 years, they will not be offered qualified teacher roles after the limit of 5 years short term supply has been reached, without a client committing to provide an induction programme.

Where a work seeker who has qualified as a Teacher overseas, but not gained UK QTS status within 4 years of teaching in the UK, they will not be offered qualified teacher roles, until QTS has been gained and evidenced.

Referrals

GSL Education as an employment business is a 'personnel supplier' and has a legal requirement under the **Safeguarding Vulnerable Groups Act 2006** to refer information to the DBS about individuals who have either harmed, or placed at risk of harm, a child or vulnerable adult.

Where **GSL Education** supplies or introduces a work seeker to a client, and the client subsequently removes the work seeker from carrying out 'regulated activity' because the client believes that the person has engaged in 'relevant conduct' or the 'harm test' is satisfied, **GSL Education** must provide information to the DBS about this matter. Additionally, if **GSL Education** decides to withdraw our services from the work seeker because we believe that the work seeker engaged in 'relevant conduct' or that the 'harm test' is satisfied, we must provide information to the DBS about this.

'Relevant conduct' is defined as:

- Conduct which endangers a child or vulnerable adult or is likely to endanger a child or vulnerable adult,
- Conduct which, if repeated against a child or vulnerable adult would endanger or would be likely to endanger him,
- Conduct involving sexual material relating to children (including possession of such material),
- Conduct involving sexually explicit images depicting violence against human beings,
- Conduct of a sexual nature involving a child or vulnerable adult.

GSL Education has a duty to refer information to the DBS if the 'harm test' is satisfied, i.e. if **GSL Education** thinks that that the person may:

- Harm a child or vulnerable adult,
- Cause a child or vulnerable adult to be harmed,
- Put a child or vulnerable adult at risk of harm,
- Attempt to harm a child or vulnerable adult,
- Incite another to harm a child or vulnerable adult.

To ensure compliance with the DBS referral rules, we have processes in place to ensure that all staff are aware of the legal duty to make a DBS referral where necessary and know the process for doing so.

Fitness to teach

To ensure compliance with the **Education (Health Standards) (England) Regulations 2002**, **GSL Education** will ask all work seekers to advise us of any health or disability issues that they believe are relevant to the role and which make it difficult for them to carry out functions that are essential to the role.

If a declaration is made, with consent from the work seeker, we will obtain confirmation from the work seeker's doctor that the work seeker is fit to teach. If we are unable to obtain this confirmation we will not proceed with the registration.

If a teacher has been retired on medical grounds by the Department of Education after 1 April 1997, the teacher will not be able to teach as they have been considered medically unfit. However, if the retirement was before 1 April 1997, the teacher may be able to work if they can evidence that they have the health and physical capacity to teach. This can be achieved by obtaining confirmation, in writing, from a GP. In these instances, they can only work a maximum of 2.5 days per week. This requirement only applies in England.

Disqualification

In order for **GSL Education** to comply with our obligations under the **Childcare Act 2006** and the **Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) Extended Entitlement (Amendment) Regulations 2018**, we must carry out appropriate checks to ensure that work seekers are not disqualified from teaching. Under the rules, individuals can either be disqualified from carrying out work with children in their own right, or disqualified by association because they live with somebody, or have somebody working in their home, who is disqualified.

Disqualification by association checks

Changes to the disqualification rules were introduced in 2018 and since then, disqualification by association only applies to those who work in childcare in a domestic setting, such as in a childminder's home (previously it applied in schools and non-domestic settings such as nurseries).

For roles involving childcare which is carried in a domestic setting only, we will require a disqualification by association declaration to be signed by candidates before we place them in any roles.

Disqualification checks

Disqualification checks are required for all candidates who are seeking work which involves 'relevant childcare roles', such as:

- provision of early years childcare
- later years childcare in nursery, primary or secondary school settings

- staff directly concerned with the management of the above.

For candidates who do not work in these 'relevant childcare roles', we will not conduct disqualification checks. For example, the following roles are not covered, staff who:

- only provide education, childcare or supervised activity during school hours to children above reception age; or
- only provide childcare or supervised activities out of school hours for children who are aged 8 or over; and
- are not involved in the management of relevant provision.

Other checks

Continued suitability

In order to ensure that all work seekers registered with **GSL Education** meet safeguarding and suitability requirements on an ongoing basis, at least once a year we will conduct status and Teacher Regulation Authority/Education Workforce Council checks (subject to any shorter period imposed by a client).

Where a work seeker has not worked with us for a period of three to six months, we will conduct status and Teacher Regulation Authority/Education Workforce Council checks and obtain an additional reference/s to cover the period in question.

Where a work-seeker has not worked with us for over twelve months the registration process will be repeated in full.

Appendix: Temporary changes in place during Covid-19

Right to work checks

On 31 March 2020, the Government announced temporary adjustments to right to work checks, making it easier for employers to recruit during the Covid-19 pandemic. The changes allow agencies to carry out checks remotely; whereby the candidate first submits a photo or scanned copy of the original document and then, during a video call, holds up the original document to the camera for the employer to see and compare to the photo or scanned document.

On 26 August 2021, Home Office confirmed that the temporary adjustments will be extended and remain in force until 5 April 2022. From that date, you must follow the prescribed checks set out in the Home Office guidance; [Right to Work Checks: an Employer's Guide](#). A scanned copy or a photo of original documents will no longer provide a defense against liability for a civil penalty.

28th March 2023 - This update replaces previous guidance issued on 6 April 2022.

The adjustments to right to work checks introduced on 30 March 2020 as part of the response to COVID-19, ended on 30 September 2022.

The end date for the temporary adjusted checks had previously been deferred to 30 September 2022 (inclusive). The date was deferred following the government's announcement enabling the use of Identification Document Validation Technology (IDVT) from 6 April 2022 by employers carrying out digital checks on British and Irish citizens who hold a valid passport.

See further information on [digital identity checks](#).

Deferring the end date ensured that employers had sufficient time to develop commercial relationships with identity service providers, make the necessary changes to their pre-employment checking processes and carry out responsible on-boarding of their chosen provider.

It has also ensured that the Right to Work Scheme has continued to support long-term, post-pandemic working practices, providing sufficient time to put measures in place to enable face to face document checks if employers do not wish to adopt digital checks for British and Irish citizens with a valid passport (or Irish passport card).

As of 1 October 2022, employers must carry out one of the prescribed checks before employment commences, as set out in guidance.

These checks are:

1. a manual right to work check (all)
2. a right to work check using IDVT via the services of an IDSP (British and Irish only)
3. a Home Office online right to work check (non-British or Irish)

Conducting any of these checks will provide employers with a statutory excuse – a defence against a civil penalty.

Further information for employers on how to conduct these checks can be found in the [employer's guide to right to work checks](#).

Online right to work service

Where a right to work check has been conducted using the [Home Office right to work online service](#), the information is provided in real time directly from Home Office systems and there is no requirement for employers to see or check the individual's documents.

Employers cannot insist individuals use this service or discriminate against those who choose to use accepted documents to prove their right to work. The list of acceptable documents in Annex A of [An employer's guide to right to work checks](#).

Retrospective checks

Employers do not need to carry out retrospective checks on those who had a COVID-19 adjusted check between 30 March 2020 and 30 September 2022 (inclusive). This reflects the length of time the adjusted checks have been in place.

Employers will maintain a defence against a civil penalty if the check undertaken during this period was done in the prescribed standard manner or as set out in the COVID-19 adjusted checks guidance.

It remains an offence to work illegally in the UK. Any individual identified who is disqualified from working by reason of their immigration status, may be liable to enforcement action.

If the job applicant or existing worker cannot show their documents

Employers must contact the [Home Office Employer Checking Service](#). If the person has a right to work, the Employer Checking Service will send you a 'Positive Verification Notice'. This provides you with a statutory excuse for six months from the date in the notice.

(<https://www.gov.uk/guidance/coronavirus-covid-19-right-to-work-checks>)

DBS checks

Similarly, since 19 March 2020, the DBS standard and enhanced ID checking guidance was changed for a temporary period. The changes introduced enable:

- ID documents to be viewed over video link,
- Scanned images to be used in advance of the DBS check being submitted, and
- The applicant will be required to present the original versions of these documents when they first attend their employment or volunteering role.

The DBS checks guidance has been updated in line with the Right to Work check guidance. Where digital ID verification has been completed successfully, documents can be viewed over video link. Where digital ID verification is not possible, manual checks must be performed and recorded.

More information on the changes is available on the [Changes to DBS checks](#) section of the Government website.

Amendments to V1 (May 2021)

We have added additional text to 3.5 Letter of professional standing for work seekers that have lived or worked overseas to refer to the Teacher Regulation Authority Country Evidence table which can be referred to for guidance on other suitable document/s where a letter of professional standing cannot be obtained.

Amendments to V2 (July 2021)

We have updated the document to account for changes regarding checking right to work, face to face interviews and working with schools when supplying early career teachers completing their induction period.

Amendments to V3 (Sep 2023)

We have updated the document to account for changes regarding checking right to work, face to face interviews and requirements for document checking for DBS applications and the use of IDVT.

HEALTH & SAFETY POLICY

Policy Reference No	GSL/POL/022.2
Last reviewed	Sep 2024

The REC auditor seeks assurance that staff understand, follow and document their obligations with regards to obtaining and transmitting health and safety information.

What to do with Client

GSL must obtain from a client, and document, health and safety information about assignments, in line with the Conduct Regulations (which require that GSL must ask clients about any risks to health and safety known to the client and what steps the client has taken to prevent or control such risks).

GSL consultants are required to ask clients about their Health & Safety information for each booking. Any information relating to health & Safety risks and mitigation will be recorded in the booking confirmation.

Dear <ClientContact.Person.PersonName>,

I am writing to confirm that <Applicant.Object.FileAs> is booked for the following assignment:

AGENCY WORKER'S DETAILS:

Name:	<Applicant.Object.FileAs>
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HIRER'S DETAILS:

School Name:	<Client.Client.Company>
School Contact:	<ClientContact.Person.PersonName> <ClientContact.Person.Surname>

ASSIGNMENT'S DETAILS:

Start Date:	<Job.Job.StartDate>
End Date:	<Job.ContractJob.EndDate>
Hours of Work (Time & Day):	8:30 - 15:30
Likely Duration of Assignment:	<Special.ASK.Duration of Assignment?>
Role Description:	<Job.Job.JobTitle>
Location of Work:	<ClientAddress.Office Address.AddressFull>
Required Experience/Training/Qualifications:	QTS and minimum 1 year teaching experience
Any known health & safety risks & steps the hirer has taken to reduce the risks:	N/A

CHARGES:

Charge Rate:	<Special.ASK.Daily/Hourly Charge Rate?>
Any expenses payable:	N/A
Intervals of Invoice:	Fortnightly

IMPORTANT:

What to do with Candidate

GSL must pass this information on to work-seekers in writing within **three** working days of giving the information verbally, as also required by the Conduct Regulations – typically this is given to work-seekers along with the other written assignment information laid out above under ‘Work-seeker checks’.

Health & Safety is mentioned in all Booking Confirmation templates. See below:



Dear <Person.Person.PersonName>,

I am writing to confirm your Supply Booking as a <Job.Job.JobTitle> at <Client.Client.Company>.
Please find below further details:

AGENCY WORKER'S DETAILS:

Name:	<Person.Person.PersonName> <Person.Person.Surname>
Address:	<PersonAddress.Home Address.AddressFull>

HIRER'S DETAILS:

School Name:	<Client.Client.Company>
School Address:	<ClientAddress.Office Address.AddressFull>
School Contact:	<ClientContact.Person.PersonName> <ClientContact.Person.Surname>
Nature of Hier's business:	Education

ASSIGNMENT'S DETAILS:

Start Date:	<Job.Job.StartDate>
End Date:	<Job.ContractJob.EndDate>
Hours of Work (Time & Day):	8:30 - 15:30
Duration of the Assignment:	<Special.ASK.Duration of Assignment>
Role Description:	<Job.Job.JobTitle>
Duties:	Planning & marking, teaching allocated timetable, attend Parents/Teacher meetings
Required Experience/Training/Qualifications:	QTS and minimum 1 year teaching experience
Any known health & safety risks & steps the hirer has taken to reduce the risks:	N/A

Medical Declaration from a candidate

The **Education (Health Standards) Regulations 2004** prohibit an individual from teaching if they do not have the health and physical capacity to do so. There is an exception to section 60 of the Equality Act 2010 where health questions can be asked in order to establish whether the person will be able to undertake *“a function which is intrinsic to the role”*. This means that you can seek specific health information to establish whether a person is able to undertake essential elements of the role without breaching section 60, but you should take care not to ask for blanket health and disability information before providing work-finding services. The request should only be made so far as this is necessary to determine the ability of the applicant to undertake any intrinsic functions of the work and only to the extent that this is necessary to assess the ability of the applicant to comply with the health standards regulations.

We obtain all the answers for the health assessment from the registration form.

What to do if a candidate declares a medical condition

If a work-seeker declares a medical condition that you consider may affect their ability to carry out the role, unless you have access to an occupational health service, **you are not in the position to make a medical judgment**. On these occasions you will need to **seek confirmation from the work-seeker’s GP** that they are fit to undertake the role in question and we suggest that you ask that the work-seeker obtains this confirmation.

If a work-seeker declares a medical condition you may not advise the client of this unless you received permission from the work-seeker. The only time that this is permissible is if the work-seeker is in a placement and the condition makes them unsuitable for the role. Even then you may not declare the condition but can withdraw the worker on ‘medical grounds’.

What to do if a candidate has been retired on medical grounds

If a teacher has been retired on medical grounds by the Department of Education after the 1st April 1997 this teacher **will not be able to teach**, even part time as they have been deemed medically unfit. However, if the teacher was retired before 1st April 1997 they may be able to work if they can show that they have the health and physical capacity to teach. They can show they are fit to work by **obtaining a GP’s letter confirming that they are fit to teach**. However, even if they are confirmed as fit to teach they will only be able to work for 2.5 days per week.

Action by consultants if medical condition declared:

- Request doctor's note for suitability
- Do not advise client of details without permission – 'withdraw on medical grounds'
- Compliance Manager to notify consultants

GSL EDUCATION: SUPPLY STAFF RULES

1. **TIME KEEPING:** Always arrive on time - if you think you are going to be late (even by three minutes!) call us so that we can inform the school.
2. **SICKNESS:** If you are pre-booked and unable to attend school due to sickness you must speak to a GSL staff member either the day before or before 7:15am the morning of the booking! Leaving a voice message, email or text is not sufficient - you **MUST** tell us over the phone.
3. **PERSONAL MEDICATION:** If you have personal medication that you may need access to during the day, you **must** notify your consultant and **declare** this to the setting on arrival and ask them for their procedure for storing and using it. Please ensure that it is clearly named and appropriately packaged
4. **COMMUNICATION:** If you have any issues with the school or the work required please raise the issue with a GSL staff member – not with the school or 3rd party. We are here to support you and the school so please communicate any issues you may have for us to resolve.
5. **PARKING:** If you intend to drive to school please inform us so that we can check whether there is parking available at the school before you commence your journey.
6. **IDENTIFICATION:** You must always take a form of photo identification with you to the school - either your passport or driver's license and the same DBS on the Update Service that you registered to work for GSL
7. **DIRECTIONS:** If you have not received a text from us with the school's directions or you do not understand the route call us immediately – do not leave it to the last minute to tell us you are unsure of where you are going!

8. **TIMESHEETS & PAY:** Timesheets are done online and will be created by GSL and approved / edited by the school. You will receive a log-in via email where you can access all your timesheets once they have been completed. On occasion, you may be required to complete a paper timesheet – a GSL staff member will notify you if this is the case. You will be paid on a fortnightly basis one week in arrears and will be provided pay-dates once your file has been cleared.
9. **PAYSLIPS:** Once your employer sets you up for online payslips, you must activate your account using the link in your Welcome email. You must register within 20 days. On clicking the registration link in the invitation email, you will be asked to activate your account. After successfully activating your account, you will be able to access your payslips and any other information relating to payroll on the myePayWindow portal. This platform is fully compliant with

General Data Protection Regulation. The website address to access the portal is: www.mypaywindow.com
10. **DRESS CODE:** Please wear professional attire at all times. Jeans/denim and trainers are not permitted! Some schools require male staff to wear a shirt and tie, please check with a GSL staff member if you are unsure of the dress code.
11. **AVAILABILITY:** In order to ensure that you are sent out for as much work as possible please make sure that you regularly update us with your availability. We will send out a text message each week - please ensure you reply stating your availability for the following week – if you don't receive this, please email or call your consultant to let us know
12. **LEAVING THE SCHOOL PREMISES:** If you are booked to work a full day and you are not scheduled into a lesson during non-break times you must wait in the staffroom and under no circumstances leave the premises unless advised otherwise.
13. **WELCOME PACK:** It is compulsory that you carefully read the Welcome Pack that was attached to your registration email before you start working for GSL. It contains all the important information that you need to be aware of when working as a supply teacher.
14. **CONFIDENTIALITY:** GSL Education work very hard to create work opportunities for our candidates. We kindly ask that you do not inform any 3rd party competitor
 - a) which schools you are working at through our agency
 - b) disclose our company name
 - c) discuss your rate of pay with another agency or candidate
 - d) introduce personal companies while representing GSL at their client school
15. **SAFEGUARDING:**
 - Avoid ANY physical contact with a child unless the child is at risk of causing danger to themselves and/or others (this includes not confiscating items, 'shepherding', restricting movement, physical restraint, blocking exits)
 - Do not give out personal contact details

- Do not use your own mobile phone, laptop or other device in school (unless in an emergency)
- Do not take photos, record videos or audio files of students on your own device
- If a child wants to speak to you in private, ensure someone is present or nearby
- If a child discloses something to you, you must first make the child aware that you cannot keep something a secret and if necessary, you will need to report it to the relevant safeguarding officer in their own words. Please make a note of who you informed and the date/time.
- Do not leave the classroom unattended
- Always follow school policies
- Report any child's absence or removal
- Do not shout, use put-downs or any inflammatory language
- Always report any challenging interactions or incidents

16. **SOCIAL MEDIA AND ONLINE PRESENCE:**

- Carefully read our Social Media Policy and take appropriate actions to ensure you are compliant with it.
- Utilise privacy settings on social media platforms to reduce likelihood of students finding you and contacting you
- Never share your personal contacts with students, never accept contact requests or messages from students, never check or access your social media accounts during placement attendance
- Be mindful of your activity on social media and online presence, as this can also impact the reputation of GSL Education and our client schools, as well as your own
- Immediately report any concerns, or breaches of the social media Policy to your consultant and if it occurs during a placement, inform the relevant staff contact in the school

17. **DISCLOSURE:** You **MUST** inform your consultant immediately, if you are made aware of any safeguarding or professional conduct allegations against you in any setting and for any other agency or employer; or if you have any new cautions or convictions.

18. Out of courtesy, we kindly ask that you provide us with at least one week notice if you are placed in a long-term assignment through GSL and wish to leave.

19. Please Like/follow us on LinkedIn, Facebook, Instagram, Twitter ☺

If you have any issues – Please speak directly with your consultant at GSL Education.

Thank you kindly for your co-operation

GSL Education

info@gsleducation.com www.gsleducation.com

ADULT BEHAVIOUR CODE

Ref	GSL/DOC/CAN/020
Last Updated	Nov 2021
Last Reviewed	Sep 2024

Purpose

This behaviour code outlines the conduct GSL Education expects from all our staff and volunteers. This includes trustees, agency staff, interns, students on work placement and anyone who is undertaking duties for the organisation, whether paid or unpaid. The behaviour code aims to help us protect children and young people from abuse and reduce the possibility of unfounded allegations being made. It has been informed by the views of children and young people. GSL Education is responsible for making sure everyone taking part in our services has seen, understood and agreed to follow the code of behaviour, and that they understand the consequences of inappropriate behaviour.

The role of teachers, support staff and tutors

While representing GSL Education you are acting in a position of authority and have a duty of care towards the children and young people we work with. You are likely to be seen as a role model and are expected to act appropriately both whilst engaged in educational activities and outside of these roles.

Responsibility

You are responsible for:

- prioritising the welfare of children and young people
- providing a safe environment for children and young people
- ensuring equipment is used safely and for its intended purpose

- having good awareness of issues to do with safeguarding and child protection and taking action when appropriate
- following our, the school or other education setting principles, policies and processes
 - including our policies and procedures for child protection/safeguarding, complaints and referrals, whistleblowing and online safety
 - including promoting and modelling principles and strategies for online safety and responsible internet use
- staying within the law at all times
- modelling good behaviour for children and young people to follow
- challenging all unacceptable behaviour and reporting any breaches of the behaviour code to your named Education Consultant or The Designated Safeguarding Officer (Sarah Andrews)
- reporting all concerns about abusive behaviour, following our safeguarding and child protection procedures
 - this includes behaviour being displayed by an adult or child and directed at anybody of any age

Rights

You should:

- treat children and young people fairly and without prejudice or discrimination
- understand that children and young people are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes, behaviour or online experiences/content that makes them uncomfortable.

Relationships

You should:

- promote relationships that are based on openness, honesty, trust and respect
- avoid favouritism

- be patient with others exercise caution when you are discussing sensitive issues with children or young people
- ensure your contact with children and young people is appropriate, approved by and meets the policies and procedures of the school you are engaged with and relevant to the work of the project you are involved in
- ensure that whenever possible, there is more than one adult present during activities with children and young people
 - if a situation arises where you are alone with a child or young person, ensure that you are within sight or hearing of other adults
 - if a child specifically asks for or needs some individual time with you, ensure other staff or volunteers know where you and the child are
- only provide personal care in an emergency and make sure there is more than one adult present if possible
 - unless it has been agreed that the provision of personal care is part of your role and you have been trained to do this safely

Respect

You should:

- listen to and respect children at all times
- value and take children's contributions seriously, actively involving them in planning activities wherever possible
- respect a young person's right to personal privacy as far as possible
 - if you need to break confidentiality in order to follow child protection procedures, it is important to explain this to the child or young person at the earliest opportunity

Unacceptable behaviour

When working with children and young people, you must not:

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances

- develop inappropriate relationships with children and young people
- make inappropriate promises to children and young people
- engage in behaviour that is in any way abusive
 - including having any form of sexual contact with a child or young person
- let children and young people have your personal contact details (mobile number, email or postal address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening, intrusive or coercive
- patronise or belittle children and young people
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people

Upholding this code of behaviour

You should always follow this code of behaviour and never rely on your reputation or that of our organisation to protect you.

If you have behaved inappropriately you will be subject to our disciplinary procedures.

Depending on the seriousness of the situation, you may be asked to leave your assignment and/or GSL Education overall. We may also make a report to statutory agencies such as the police and/or the local authority child protection services.

If you become aware of any breaches of this code, you must report them to your dedicated Education Consultant, the DSO (Sarah Andrews) or your line manager at the client school or education establishment where you are currently assigned. If necessary you should follow our or you're your school or education establishments' whistleblowing procedure, Complaints Procedure and safeguarding and child protection procedures.

BEHAVIOUR CODE FOR CHILDREN AND YOUNG PEOPLE

Ref	GSL/DOC/CAN/021
Last Updated	Sep 2024
Last Reviewed	Sep 2024

Purpose

This code of behaviour was written in consultation with children and young people. It aims to make sure everyone who participates in GSL Education's services knows what is expected of them and feels safe, respected and valued. GSL Education must make sure that everyone taking part in our services has seen, understood and agreed to follow the code of behaviour, and that they understand the consequences of inappropriate behaviour. We expect people who take part in our services to display appropriate behaviour at all times. This includes behaviour that takes place outside our organisation and behaviour that takes place online.

Basic principles

This code of behaviour aims to:

- identify acceptable and unacceptable behaviour
- encourage cooperation, honesty, fairness and respect
- create an environment where your self-esteem, self-respect and self-confidence will grow
- encourage you to recognise and respect the rights of others
- encourage you to take responsibility for your own behaviour
- encourage you to voice concerns for yourself or others
- help resolve conflicts and make it clear what will happen if you decide not to follow the code

Dos and don'ts

You should:

- cooperate with others
- be friendly
- listen to others
- be helpful
- have good manners
- treat everyone with respect
- take responsibility for your own behaviour
- talk to your tutor, class or form teacher about anything that worries or concerns you
- follow this code of behaviour and other rules (including the law)
- join in and have fun!

You shouldn't:

- be disrespectful to anyone else
- bully other people (online 'cyber bullying' or offline - including physical, verbal, about their individual traits or about their cultural or religious background)

- behave in a way that could be intimidating
- be abusive towards anyone
- share any material or content online that is not part of your learning

[Please print a copy of these dos and don'ts and ensure they are visible at all times].

What happens if I decide not to follow the code of behaviour?

This code of behaviour is part of our process for making sure everyone who takes part in our services receives the support they need.

Minor or first-time incident

If you behave in a way that doesn't follow our behaviour code, our member of staff will remind you about it and ask you to comply with it. They will give you an opportunity to change your behaviour.

This gives you the chance to think and to plan how you could behave differently, with support from our staff or your school staff.

Formal warning

If you continue not to follow the code of behaviour after your first reminder, or if your behaviour is more serious, you will be given a formal warning by the person running your session. They will make a record about what happened and inform your school, parents or carers if this is appropriate. They will also talk with you about what happened and agree what support you need to improve your behaviour in the future.

Final warning

If the support we have put in place isn't helping you to change your behaviour, we may need to give you a final warning. Again this will be recorded and we'll inform your school, parents or carers as appropriate.

At this point, we may need to talk with you and your school, parents or carers about other services that might be more able to give you the support you need.

Child protection procedures

If any member of staff becomes concerned that your behaviour suggests you may be in need of protection or that you may present a risk of harm to other children and young people, they will follow our child protection procedures. This may involve making a referral to the local authority.

If child protection procedures are necessary, we will talk this through with you and your parents as soon as possible, unless doing so would put you in danger or interfere with a police investigation.

If you wish to report a concern about you or someone else, you should speak to a trusted adult – eg your form teacher, school safeguarding lead, GSL tutor.

What will happen if I report a concern?

- You will be asked to describe the details of the concern in your own words and this will be written down.
- You will be told if this information will need to be shared with anyone else (it may have to be shared if someone is at risk of harm, so that help can be provided and a proper investigation can be done. It will only be shared with official people that need to know and can help).
- Your report will be kept safely and added to any other evidence or information that has been gathered.
- If the report is about you, you will be told about what the next steps will be.
- If the concern is about someone else, you may not be told about what happens next, but if you are still worried or have new information you should make another report.

SOCIAL MEDIA POLICY - AGENCY WORKERS

Policy Reference	GSL/POL/039
Last Updated	June 2023
Last Reviewed	Sep 2024

GSL Education recognises and embraces the numerous benefits and opportunities that social media offers. While our agency workers are encouraged to engage, collaborate and innovate through social media, they should also be aware that there are some associated risks, especially around issues of safeguarding, bullying and personal reputation.

PURPOSE OF THE POLICY:

- The purpose of this policy is to encourage responsible, thoughtful practice, to protect agency workers engaged by GSL Education; client schools/trusts and their employees, students and communities; and to promote the effective use of social media as part of the school/trust activities, in line with their own policies.
- This policy covers personal and professional use of social media and aims to encourage its safe use by agency workers engaged by GSL Education.
- The policy applies regardless of whether the social media is accessed using GSL Education IT facilities and equipment, school's IT facilities and equipment, or equipment belonging to agency workers engaged by GSL Education.
- Personal communications via social media accounts that are likely to have a negative impact on professional standards, GSL Education's reputation, or client school/Trust's reputation are within the scope of this policy.
- This policy covers all agency workers working at all levels and grades

ROLES, RESPONSIBILITIES AND PROCEDURE:

Agency Workers should:

- be aware of their online reputation and recognise that their online activity can be seen by others including employers, parents, pupils and colleagues on social media;
- ensure that any use of social media is carried out in line with this policy and other relevant policies, including those of client schools/trusts
- be aware that any excessive or inappropriate use of social media at work or on placement or between placements may result in disciplinary action;
- be responsible for their words and actions in an online environment. They are therefore advised to consider whether any comment, photograph or video that they are about to post on a social networking site is something that they want pupils, colleagues, other employees, or even future employers, to read. If in doubt, don't post it!

Managers and Consultants are responsible for:

- addressing any concerns and/or questions agency workers may have on the use of social media;
- operating within the boundaries of this policy and ensuring that all agency workers understand the standards of behaviour expected of them.

Human resources (HR) are responsible for:

- giving specialist advice on the use of social media;
- implementing and reviewing this policy.

DEFINITION OF SOCIAL MEDIA:

Social Media is a broad term for any kind of online platform which enables people to directly interact with each other. It allows people to share information, ideas and views. Examples of social media include blogs, Facebook, LinkedIn, Twitter, Google+, Instagram, Tik Tok, Snap Chat, Myspace, Flickr and YouTube.

ACCEPTABLE USE:

Agency workers should be aware that content uploaded or shared to social media is not private. Even if you restrict it to 'friends', there is still capacity for it to be re-posted or distributed beyond the intended recipients. Therefore, agency workers using social media should conduct themselves with professionalism and respect.

Agency workers should not upload any content on to social media platforms that:

- is confidential to GSL Education, its staff, clients or agency workers; the client school/trust or its staff, students or community
- amounts to bullying
- amounts to unlawful discrimination, harassment or victimisation
- brings GSL Education and/or client schools/trusts into disrepute
- contains lewd, sexually explicit, threatening or similarly inappropriate or offensive comments, images or video clips
- undermines the reputation of GSL Education and/or client schools/trusts, and/or individuals

- is defamatory or knowingly false
- breaches copyright
- is in any other way unlawful.

Agency workers should be aware of both professional and social boundaries and should not therefore accept or invite 'friend' requests from pupils or ex-pupils under the age of 18, or from parents on their personal social media accounts such as Facebook. All communication with parents via social media should be through the school/trust's social media accounts, in line with their policies. Staff and agency workers should note that the use of social media accounts during the working day or whilst on placement is not permitted.

Use of social media in practice for agency workers - for personal and professional use

Agency workers must not have 1:1 communication, including direct messaging (DM), with pupils through any social media, apart from via approved school/trust accounts and only with express permission or direction from the school/trust. All use of school/trust platforms must comply with their policies and procedures.

Agency workers should not request or accept any current student of the School of any age or any ex-student of the School under the age of 18 as a friend, follower, subscriber or similar on any personal social media account unless they are the parent of the pupil or a close family member. It is advisable that agency workers do not have contact with past pupils (above school age).

Any communication received from current pupils on any personal social media sites must be reported immediately to the school/trust DSL and GSL Education consultant.

If any agency worker is aware of any inappropriate communications involving any student in any social media, these must immediately be reported to the school/trust DSLs.

Agency workers must ensure that, wherever possible, and where the social media platform allows, their privacy settings on social media sites are set so that pupils cannot access information relating to their personal lives or follow them on their personal accounts.

All email communication between agency workers and pupils of the client School/trust on school/trust business must be made from an official school/trust email account (any deviation from this in an emergency must at once be reported to the school/trust and GSL Education consultant).

Agency workers should not use personal email accounts or personal mobile phones to contact pupils of the School, nor should any such contact be accepted, except in circumstances such as school trips or away matches that have been given prior approval.

Agency workers should not post or publish on the internet or on any personal social networking platform, any reference to GSL Education, client Schools/Trusts or their colleagues (apart from in the context of using social media for networking or marketing purposes, such as LinkedIn), parents, pupils or family related information or discuss pupils or colleagues or criticise GSL Education, client schools/trusts or staff.

Agency workers may like, share or make appropriate comments in response to GSL Education, client school/trust official social media accounts.

Agency workers must not post images on any social media account that includes pupils.

Agency workers are instructed to consider the reputation of GSL Education and client schools/trusts in any social media activity.

Guidance and advice for staff

Most common social networking platforms are inherently insecure places to have discussions which contain any sensitive information. Privacy laws can be violated and the reputation of GSL Education, schools and trusts can be damaged if the public sees a discussion of any sensitive information taking place on social networking. Agency workers should be aware that these types of cases can result in disciplinary action.

Workplace Privacy

GSL Education respects agency workers' rights to privacy and to express themselves. However, agency workers must also respect, and diligently protect, the privacy of fellow

agency workers, consultants, staff members, pupils, parents, and others. Privacy and confidentiality must be maintained in every possible way. Agency workers must not discuss pupil or family related information via social networking and public social media, texting, or online unless it is an approved medium and for a school/trust related purpose.

Agency workers are advised to be extremely cautious in conversations with other agency workers, parents and volunteers in social networking, on the basis that privacy laws can be violated even if a person's name is not shared.

GSL Education recommends that agency workers use security and privacy settings provided by social networking platforms. Regardless of privacy settings, agency workers are advised to be respectful and responsible in all activity if it in any way involves or references GSL Education, Client schools/trusts, job, or those staff they work with. Agency workers must understand that on-line content is difficult, if not impossible to retract once posted or sent.

Agency workers should recognise that there is the possibility of being legally liable for something inappropriate that is shared online.

If a member of the media or non-traditional online media (including bloggers) contacts an agency worker about the business of GSL Education, client schools/trusts, or other staff/agency workers (e.g., programmes, services, pupils, parents, clubs, policies, practices, or additional business information of any kind), the individual must contact GSL Education before responding.

SAFEGUARDING:

The use of social networking platforms introduces a range of potential safeguarding risks to children and young people.

Potential risks can include, but are not limited to:

- online bullying;
- grooming, exploitation or stalking;
- exposure to inappropriate material or hateful language;
- encouraging violent behaviour, self-harm or risk taking.

In order to mitigate these risks, there are steps you can take to promote safety on line:

- You should not use any information in an attempt to locate or meet a child.
- Ensure that any messages, photos or information comply with existing policies.

Reporting safeguarding concerns

- Any content or online activity which raises a safeguarding concern must be reported to the GSL Education safeguarding officer and the safeguarding lead in the client school/trust
- Any online concerns should be reported as soon as identified as urgent steps may need to be taken to support the child.
- With regard to personal safeguarding for agency workers, you should report any harassment or abuse you receive online in relation to your work with us, to GSL Education.

REPORTING, RESPONDING AND RECORDING CYBERBULLYING INCIDENTS:

- Agency workers should never engage with cyberbullying incidents. If you discover a website containing inaccurate, inappropriate or inflammatory written material relating to you, or images of you which have been taken and/or which are being used without your permission, you should immediately report this to your manager/consultant, who will also inform the Compliance Manager
- Agency workers should keep any records of the abuse such as text, emails, voicemail, website or social media. If appropriate, screen prints of messages or web pages could be taken and the time, date and address of site should be recorded.

ACTION BY GSL EDUCATION: INAPPROPRIATE USE OF SOCIAL MEDIA:

- Following a report of inappropriate use of social media, the senior manager will conduct a prompt investigation with the support and guidance of the compliance manager

- If in the course of the investigation, it is found that a pupil submitted the material to the platform, the client school/trust will be informed and the school policy and procedures will be followed
- The compliance manager, where appropriate, will approach the platform hosts to ensure the material is either amended or removed as a matter of urgency, ie within 24 hours. If the platform requires the individual who is complaining to do so personally, GSL Education will give their full support and assistance.
- Checks will be carried out to ensure that the requested amendments or removals are made. If the platform(s) does not co-operate, the compliance manager will follow the appropriate procedures of reporting and complaints
- If the material is threatening and/or intimidating, senior management will, with the member agency workers's consent, report the matter to the police.
- The member of agency worker will be offered full support and appropriate stress counselling.

BREACHES OF THIS POLICY BY AGENCY WORKERS:

Any agency worker suspected of committing a breach of this policy (or if complaints are received about unacceptable use of social networking that has potentially breached this policy) will be investigated in accordance with the GSL Education's bullying or disciplinary procedure. The agency worker will be expected to co-operate with the investigation which may involve:

- handing over relevant passwords and login details;
- printing a copy or obtaining a screenshot of the alleged unacceptable content;
- determining that the responsibility or source of the content was in fact the agency worker.

The seriousness of the breach will be considered including the nature of the content, how long the content remained visible on the social media platform, the potential for recirculation by others and the impact on GSL Education and/or the client school/trust or the individuals concerned.

Agency workers should be aware that actions online can be in breach of the harassment/IT/equality policies and any online breaches of these policies may also be treated as conduct issues in accordance with the disciplinary procedure. If the outcome of an investigation leads to disciplinary action, the consequences will be dealt with in accordance with the appropriate procedures. Serious breaches could result in the dismissal of the agency worker. Where conduct is considered to be unlawful, and/or meet the harm threshold for LADO referral, GSL Education will report the matter to the police and other relevant external agencies.

MONITORING AND REVIEW:

From time to time client schools/trusts will monitor or record communications that are sent or received from within the school/trust's network.

This policy will be reviewed on a yearly basis and, in accordance with the following, on an as-and-when-required basis:

- legislative changes;
- good practice guidance;
- case law;
- significant incidents reported.

This policy does not form part of any agency worker's contract of employment and may also, after consultation with the trade unions, be amended from time to time by GSL Education.

LEGISLATION:

Acceptable use of social networking must comply with UK law. In applying this policy, GSL Education will adhere to its rights, responsibilities and duties in accordance with the following:

- Regulation of Investigatory Powers Act 2000
- General Data Protection Regulations (GDPR) 2018
- The Human Rights Act 1998
- The Equality Act 2010

- The Defamation Act 2013

The internet is a fast-moving technology and it is impossible to cover all circumstances or emerging media – the principles set out in this policy must be followed irrespective of the medium. When using social media, staff should be aware of the potential impact on themselves and GSL Education, client schools/trusts, young people and communities, whether for work-related or personal use; whether during working hours or otherwise; or whether social media is accessed using GSL Education's equipment, the school/trust's equipment or using the agency worker's equipment. Agency workers should use discretion and common sense when engaging in online communication. There are some general rules and best practice in GSL Education's Staff Rules, which agency workers must adhere to.

Appendix 1: Indicators of abuse and neglect

(Adapted from Keeping Children Safe in Education 2024 - Part 1)

All staff should know that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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 from 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child-on-child abuse All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse). And that it can happen both inside and outside of school or college and online.

It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports.

All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment

Child abduction and community safety incidents Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for practitioners

County lines County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection

- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office and The Children's Society County Lines Toolkit For Professionals

Children and the court system Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The Children and Family Court Advisory Support Service (Cafcass) guides for young people explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children.

The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children who are absent from education All staff should be aware that children being absent from school or college, particularly unexplained, repeated and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school or college's unauthorised absence procedures and children missing education procedures.

Children with family members in prison Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO, provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Cybercrime Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
 - 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and,
 - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
- Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK.

Domestic abuse The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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

The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any person under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Operation Encompass Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 08:00 to 13:00, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safe Young Lives: Young people and domestic abuse | Safelives
- Domestic abuse: specialist sources of support (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Homelessness Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local

authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: [here](#). Mental health Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school.

More information can be found in the Mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice.

Modern Slavery and the National Referral Mechanism (NRM) Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Preventing radicalisation Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.

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

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

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

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different

methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect people from extremist ideologies and intervene to prevent those at risk of radicalisation being drawn to terrorism.

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

The Prevent duty All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales.

Channel Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multiagency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required.

A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided. The designated safeguarding lead (or deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty.
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

Educate Against Hate, is a government website designed to support school and college teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the Prevent for FE and Training. This hosts a range of free, sector specific resources to support further education settings to comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, to support staff and governors/Board members in outlining their roles and responsibilities under the duty.

Sexual violence and sexual harassment between children in schools and colleges Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of this guidance.

Serious Violence There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent, or permanently excluded, from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy. Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence. Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined-up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act 2022 introduced a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked,

and there will be a requirement for the partnership to consult with all such institutions in their area. The duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

So-called ‘honour’-based abuse (including Female Genital Mutilation and Forced Marriage) So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children’s social care.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see below).

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

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what

is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies.

Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school or college’s designated safeguarding lead (or deputy) and involve local authority children’s social care as appropriate.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced marriage Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage.

Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on the role of schools and colleges) and, multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

Appendix 2 – Early Help

(Taken from Keeping Children Safe in Education 2023 - Part 1)

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

is disabled or has certain health conditions and has specific additional needs

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

[Keeping Children Safe in Education 2024](#)