



Safeguarding Policy

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1. Introduction

“Learn to do right; seek justice. Defend the oppressed.” Isaiah 1:17

Church schools in the Diocese of London educate more than 55,000 pupils. The LDBS supports and serves these schools to be safe places where every child can flourish.

Our commitment to safeguarding is rooted in the Christian understanding that every child and young person deserves love, care and protection because each one is precious and made in the image of God. Keeping children safe is everybody’s responsibility.

Our approach to safeguarding says much about our organisational culture, the extent to which we value the children we serve, and the extent to which we apply the same standards to ourselves as we apply to our schools.

There is a clear duty for everyone supporting or working with children and young people to safeguard and promote their welfare and an expectation that everyone who works for or represents LDBS will behave in an exemplary manner towards the staff and pupils with whom they come into contact.

This policy applies to LDBS, Grow Education and SCITT staff, consultants and contractors and to SCITT students.

This policy does not apply to Church schools, because the responsibility for safeguarding in a school rests with the governing body or academy trustees.

2. Legislative Framework

- Safeguarding is an integral part of the life and ministry of the Diocese of London. LDBS is required by **Section 5A of the Safeguarding and Clergy Discipline Measure 2016** to comply with requirements issued by the House of Bishops on safeguarding children and vulnerable adults.¹ The Church of England has published a suite of policy and practice guidance to which the LDBS has due regard² including training expectations set out in **Safeguarding: learning and development** published in 2021 under Section 5.³

¹ <https://www.legislation.gov.uk/ukcm/2016/1/section/5>

² <https://www.churchofengland.org/safeguarding/policy-and-practice-guidance>

³ <https://www.churchofengland.org/sites/default/files/2021-06/SafeguardingLearningAndDevelopmentFramework2021.pdf>

- **Keeping Children Safe in Education** sets out statutory guidance for schools and colleges on safeguarding children and safer recruitment.⁴
- **Working Together to Safeguard Children** sets out statutory guidance on inter-agency working to safeguard and promote the welfare of children.⁵
- The **Early Years Foundation Stage (EYFS) Statutory Framework** sets out the standards that schools and childcare providers must meet for the learning, development and care of children from birth to 5, including ensuring children are kept healthy and safe.⁶
- The **Ofsted Inspection Framework** sets out the basis on which inspectors judge whether safeguarding is effective in education settings.⁷

3. Expectations

3.1 **LDBS, Grow Education and SCITT staff** are expected to:

- Abide by the policies set out in the LDBS Staff Handbook including the Code of Conduct
- Undertake refresher safeguarding training every three years
- Support and promote a healthy Christian culture within LDBS in which openness, transparency and honesty lead to ongoing organisational learning and development

3.2 **LDBS, Grow Education and SCITT consultants and contractors** are expected to:

- Abide by the policies set out in the Consultant Handbook including the Code of Conduct
- Undertake refresher safeguarding training every three years
- Support and promote a healthy Christian culture within LDBS, Grow and the SCITT in which openness, transparency and honesty lead to ongoing organisational learning and development

3.2 **LDBS, Grow Education and SCITT staff, consultants and contractors who give advice** in relation to safeguarding are expected to:

- Ensure that advice about appointments promotes safer recruitment practices
- Ensure that advice about safeguarding policies and processes reflects the requirements of the relevant legislative frameworks
- Ensure that advice reflects current best practice by maintaining their own professional development
- Attend safer recruitment training at least every three years

3.3 **LDBS, Grow Education and SCITT staff, consultants and contractors who visit education settings** are expected to:

- Hold an enhanced DBS certificate
- Work within the legislative frameworks and the school's own safeguarding and behaviour policy
- Be alert to safeguarding concerns
- Respond in line with the school's own policy in the event of a disclosure
- Ensure risk assessments consider safeguarding risks, including for those who are most vulnerable
- Avoid physical contact with children

⁴ <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

⁵ <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

⁶ <https://www.gov.uk/government/publications/early-years-foundation-stage-framework--2>

⁷ <https://www.gov.uk/government/collections/education-inspection-framework>

- Not use mobile technology to contact or take photographs of children
- Share any concerns noted during the visit with senior leaders, preferably the DSL or Headteacher, and ensure that this is noted in the Record of Visit e.g. 'concerns about the open gate were shared with the Headteacher'.

3.4 The People and Culture Director is expected to:

- Ensure safer recruitment practices are followed in the appointment and induction of LDBS, Grow Education and SCITT staff, contractors and consultants
- Provide advice to the DDE in the event of an allegation (see 4.2)
- Provide support and advice to schools with safeguarding queries relating to school staff

3.5 The Diocesan Director of Education is expected to:

- Be the Safeguarding Serious Incident Reporter
- Appoint an LDBS Advisor with responsibility for Safeguarding
- Ensure any photographs used by LDBS are used with the permission of the child's school and in line with the consent and safeguarding requirements of the school

3.6 The LDBS Advisor with responsibility for safeguarding is expected to:

- Be qualified to Level 3
- Oversee training for LDBS staff
- Provide advice for LDBS staff
- Provide support and advice to schools with safeguarding queries relating to children
- Refer school leaders to the People and Culture Director if the concern relates to a member of school staff
- Maintain an open dialogue with the Diocese of London Head of Safeguarding to ensure a joined-up response to allegations or incidents involving both schools and clergy/ churches
- Where possible, work closely with LA safeguarding link personnel to collaboratively support pupils and staff in LDBS schools.

3.6 The Managing Director of Grow Education is expected to:

- Work closely with the People and Culture Director and the LDBS Advisor with responsibility for safeguarding to ensure that:
 - Safer recruitment procedures and induction of new staff, consultants and contractors are followed
 - Safeguarding training for all staff is regularly updated in line with this policy
- Ensure any photographs used by Grow Education are used with the permission of the child's school and in line with the consent and safeguarding requirements of the school

3.7 The Programme Director of the SCITT is expected to:

- Work closely with the People and Culture Director and the LDBS Advisor with responsibility for safeguarding to ensure that:
 - Safer recruitment procedures and induction of new staff, consultants and contractors are followed
 - Safeguarding training for all staff is regularly updated in line with this policy
- Any photographs used by the SCITT are used with the permission of the child's school and in line with the consent and safeguarding requirements of the school
- Ensure that SCITT students receive appropriate training and are aware of this policy.

3.9 LDBS SCITT students are expected to:

- Hold an enhanced DBS certificate

- Work within the legislative frameworks and the school's own policy when they are working in a school environment
- Be alert to safeguarding concerns
- If someone makes a disclosure, respond in line with the school's own policy
- Ensure risk assessments consider safeguarding risks
- When attending the SCITT offices, ensure that this policy is followed, in particular Section 4 (Responding to an Allegation)

3.7 LDBS trustees and Grow Education Directors are expected to:

- Attend safeguarding refresher training for charity trustees once every three years
- Appoint one Trustee as the Trustee Lead for Safeguarding. This person will be the point of contact for the DDE or any member of LDBS, Grow Education or SCITT staff wishing to raise a concern or make an allegation.
- Approve the process for reporting serious incidents to the Charity Commission
- Approve the process for dealing with a safeguarding concern or allegation that relates to a member of LDBS, Grow Education or SCITT staff, a consultant or contractor or a Trustee
- Ensure safer recruitment practices are followed when appointing LDBS Governors and Academy Directors to serve in Church schools
- Periodically review the effectiveness of this policy

3.8 The Standing Committee of the LDBS Board is expected to:

- Make decisions on behalf of the LDBS Board in relation to reporting safeguarding serious incidents to the Charity Commission insofar as any such decision requires a rapid response that falls outside of the usual meeting cycle

4. Responding to an allegation

4.1 If the DDE receives an allegation against a member of LDBS, Grow Education or SCITT staff, consultant or contractor involving pupils/students in a school:

- The DDE will contact the LADO within one working day of all allegations that come their attention, or that are made directly to the police, and will follow their advice
- The DDE will work with the LADO and any other agencies which may then become involved
- The DDE will determine, in the event of an investigation being requested, the most appropriate person to carry out the investigation.

4.2 If a member of LDBS, Grow Education or SCITT staff, consultant or contractor or a SCITT student contractor, wishes to raise a concern or make an allegation against a member of LDBS, Grow Education or SCITT staff within the LDBS working environment:

- They should raise the allegation with the DDE
- The DDE, in receipt of an allegation, will seek advice from the People and Culture Director to determine the nature of the allegation and will then follow the most appropriate policy and procedures (e.g., complaints, online behaviour, gross misconduct)
- The DDE will additionally consider the allegation with regard to the role and the possible impact on working in schools (KCSiE 2024)
- The DDE will determine, in the event of an investigation being required, the most appropriate person to carry out the investigation
- In all cases the DDE will follow policy and act fairly and openly

- If the allegation concerns the DDE, LDBS staff should contact the Trustee Lead for Safeguarding

The LDBS Safeguarding Serious Incident Reporter is **Penny Roberts**

The LDBS Advisor with special responsibility for Safeguarding is **Helen Ridding**

The Safeguarding lead for LDBS trustees is **Catherine Allard**

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[London Diocesan Board for Schools] ([313000])

Delegation by the members of the DBE: Reporting of Serious Incidents to the Charity Commission

Date: [23.03.22⁸]

Note that references to LDBS staff include LDBS, Grow Education and SCITT staff, consultants and contractors and references to LDBS include its subsidiary Grow Education and its SCITT.

1. Background

- 1.1 The members of the [LDBS⁹], as charity trustees, are responsible for reporting ALL Serious Incidents to the Charity Commission in a timely manner, in accordance with the Charity Commission's guidance¹⁰.
- 1.2 The House of Bishops has issued specific Church of England safeguarding guidance for DBEs, under s.5 of the Safeguarding and Clergy Discipline Measure 2016, which has been reviewed by the Charity Commission (“**DBE Safeguarding SIR Guidance**”). DBEs have a legal duty to have due regard to DBE Safeguarding SIR Guidance when reporting safeguarding Serious Incidents to the Charity Commission.
- 1.3 If a safeguarding incident is identified within the [LDBS] the incident must be responded to, reported and managed in accordance with the relevant House of Bishops' Safeguarding Policy and Guidance or Code of Practice¹¹, as the case may be.
- 1.4 If a non-safeguarding incident is identified within the [LDBS], such immediate steps or actions as may be required to secure and protect the [LDBS's] property, assets and reputation must be taken, in accordance with the [LDBS's] internal policies or procedures.

The members of the [LDBS] delegate the reporting of Serious Incidents to the Charity Commission in accordance with the resolutions in sections 2 and 3 below. There are separate delegations for reporting safeguarding and non-safeguarding Serious Incidents to the Charity Commission to reflect the additional requirements in relation to reporting safeguarding Serious Incidents as provided for in the DBE Safeguarding SIR Guidance.

- a) Section 2 is a resolution to delegate responsibility for reporting safeguarding Serious Incidents to the Charity Commission and the National Safeguarding Team.
- b) Section 3 is a resolution to delegate responsibility for reporting non-safeguarding Serious Incidents to the Charity Commission.

⁸ Insert date resolution passed.

⁹ Replace all references to “DBE” in [] with the name of your DBE.

¹⁰ [How to report a serious incident in your charity - GOV.UK \(www.gov.uk\)](#)

¹¹ [Safeguarding e-manual | The Church of England Policy and practice guidance | The Church of England](#)

2. DELEGATION of responsibility to report SAFEGUARDING Serious Incidents to the Charity Commission in accordance with the DBE Safeguarding SIR Guidance
 - 2.1 In order to facilitate the confidential and timely reporting of any safeguarding Serious Incidents to the Charity Commission, the responsibility for decisions relating to the reporting of any safeguarding Serious Incidents is delegated to [the Standing Committee of the LDBS Board¹²]. All references to the Trustee Group in this delegation are references to this smaller group of trustees.
 - 2.2 [Penny Roberts¹³] is the DBE's nominated Safeguarding Serious Incident Reporter for the purposes of the DBE Safeguarding SIR Guidance.
 - 2.3 *The following responsibilities relating to the reporting of safeguarding Serious Incidents are delegated to the DBE Safeguarding Serious Incident Reporter*
 - a) Responsibility to decide, in consultation with the [LDBS Adviser with special responsibility for Safeguarding¹⁴] where appropriate, whether a safeguarding incident is sufficiently "Serious" in accordance with the DBE Safeguarding SIR Guidance for it to be reported to the Charity Commission.
 - b) Responsibility for informing the Trustee Group of the incident, the steps being taken to address it and whether it is sufficiently "Serious" to be reported to the Charity Commission.
 - c) If the DBE Safeguarding Serious Incident Reporter considers that an incident does NOT need to be reported to the Charity Commission, the DBE Safeguarding Serious Incident Reporter is responsible for informing the Trustee Group of the reasons for the decision not to report it to the Charity Commission. These reasons should be agreed with the Trustee Group and recorded in writing by the DBE Safeguarding Serious Incident Reporter.
 - d) Responsibility for reporting the safeguarding Serious Incident using the Charity Commission's online form.
 - e) Responsibility for sending copies of any safeguarding Serious Incident reports submitted to the Charity Commission on behalf of the [LDBS] to:
 - (i) the Trustee Group (or all the DBE members where appropriate);
 - (ii) the DDE (where appropriate);
 - (iii) [Martin Goodwin, Head of Safeguarding for the Diocese];
 - (iv) the DBE's auditors; and
 - (v) the National Safeguarding Team.
3. DELEGATION of responsibility to report all OTHER Serious Incidents to the Charity Commission
 - 3.1 [¹⁵In order to facilitate an appropriate, confidential and timely response to any Serious Incidents, the responsibility for decisions relating to the reporting of any non-safeguarding

¹² Include list of the smaller group of DBE directors with safeguarding responsibilities.

¹³ If that person is on holiday, or is implicated in the alleged Serious Incident, the person holding the alternative role in clause 3.2 should be informed instead.

¹⁴ Insert role of person to be consulted - this could be one or more of the DSA, the DDE or a safeguarding professional appointed by the DBE.

¹⁵ Include if required/appropriate for your DBE.

Serious Incidents is delegated to [the Standing Committee of the LDBS Board¹⁶]. All references to the Trustee Group in this delegation are references to this smaller group of trustees.]

3.2 *The following responsibilities relating to the reporting of NON-SAFEGUARDING Serious Incidents are delegated to the [DDE¹⁷] or [the Deputy DDE with responsibility for safeguarding¹⁸]*

- a) Responsibility for deciding whether, in accordance with the Charity Commission's Guidance, the incident is sufficiently Serious to require reporting to the Charity Commission.
- b) Responsibility for informing the [Trustee Group] of the incident, and the steps being taken to address it and whether it needs to be reported to the Charity Commission.
- c) If the [DDE] considers that an incident does NOT need to be reported to the Charity Commission, the [DDE] is responsible for informing the [Trustee Group] of the reasons for the decision not to report it to the Charity Commission. These reasons should be agreed with the [Trustee Group] and should be recorded in writing by the [DDE].
- d) Responsibility for reporting the Serious Incident using the Charity Commission's online form.
- e) Responsibility for sending copies of any Serious Incident reports submitted to the Charity Commission on behalf of the [LDBS] to the [Trustee Group (or all the DBE members where appropriate)] and to the DBE's auditors.

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¹⁶ Include a list of the smaller group of DBE members who will have this responsibility.

¹⁷ Insert role to reflect your DBE's policy.

¹⁸ If the person in the previous role specified is on holiday, or is implicated in the alleged Serious Incident, the person holding the alternative role should undertake the responsibilities in their place.