

**Independent Schools Inspectorate
Safeguarding Policy**

June 2024

DATE OF POLICY:	June 2024
POLICY OWNER	Chief Executive Officer-Chief Inspector
APPROVED BY	ISI Board
DATE OF NEXT REVIEW	June 2025

If you think a child is at risk

1. If a child is in immediate danger, call 999.
2. If you think a child is at risk, contact the children’s social care team at their local council or call your local police on 101.
3. You should also tell the Designated Safeguarding Lead (DSL) at the child’s school. You can find out who this is in the school’s safeguarding policy, which must be on their website.

Summary table of where to send concerns about schools relating to safeguarding (see also paragraphs 17-20 below)

4.

Concern about a school (unless an inspection is happening)	Complain about a school: Private schools
Concern about a school while an inspection is happening	Contact safeguarding@isi.net

Aims and objectives

5. School inspection, as part of the wider safeguarding system, provides assurance to the Department for Education (DfE) on the extent to which schools meet the required standards in relation to safeguarding at the time of inspection. It contributes to the promotion of strong safeguarding practice in schools.
6. ISI’s values are putting children first, integrity, diversity and transparency. ISI reviews its policies and practices regularly to promote their continued effectiveness. This policy is reviewed annually.
7. This document sets out the arrangements ISI makes to ensure:
 - that ISI inspections prioritise the safety and welfare of children in accordance with the latest statutory guidance incorporated into the Independent School Standards and other relevant standards and frameworks applicable to the school being inspected;
 - the suitability of ISI staff, inspectors and other contractors and directors to perform their respective roles;
 - that the ISI executive is held to account effectively by its Board.
8. This policy applies to the ISI group.

The definition of safeguarding

9. ISI adopts the definition in the introduction to [Working together to safeguard children](#). This defines safeguarding and promoting children and young people’s welfare 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children’s Social Care National Framework.

ISI’s approach to inspection

10. National requirements for safeguarding and promoting the welfare of pupils in state-maintained and independent schools are set by the Secretary of State through the DfE. ISI inspects whether schools are meeting statutory safeguarding requirements on every inspection and reports its findings to the DfE.
11. ISI prioritises the safety and welfare of children throughout its inspection practice. On inspection, ISI checks that schools and colleges have appropriate measures in place to safeguard and promote the welfare of children, having regard to statutory guidance. It also checks that school staff refer concerns to the appropriate authorities in the relevant jurisdiction, whether in the United Kingdom in the case of English schools and colleges, or overseas in the case of British Schools Overseas¹.
12. ISI’s inspection responsibilities around safeguarding include the evaluation of the effectiveness of a school’s safeguarding policy, practice and culture and reporting of any specific safeguarding concerns. The detail of inspection activity concerning safeguarding is to be found at [Information about safeguarding](#) on ISI’s website. Detailed guidance and training are provided to inspectors.
13. Examples of areas inspectors will consider are:
 - The school’s culture of safeguarding, including its assessment and management of risk;
 - Staff’s understanding of the complexities of safeguarding and that ‘it could happen here’;
 - Staff’s understanding of the prevalence of some forms of abusive and harmful behaviours and appreciation that, even if there are no reports in their schools or colleges, it does not mean it is not happening;
 - The sufficiency of action by staff in response to safeguarding or child welfare concerns;
 - Provision of a suitable designated safeguarding lead for safeguarding and child protection within a school;
 - The effectiveness of training for staff, pupils or governors;
 - How well records or reviews of serious incidents are kept and reviewed;
 - The effectiveness of the school’s response to all forms of abuse (including bullying), defined in statutory guidance, by whatever medium, including online;
 - safer recruitment and vetting understanding and/or processes as demonstrated by records of recruitment checks and scrutiny and understanding of staff;
 - How effectively the school shares information appropriately or in a timely way with relevant statutory agencies about, for example, children and young people in need or at risk of harm, or about allegations;
 - The effectiveness of processes for handling allegations, including failure to share information with relevant statutory agencies or to take appropriate advice.
14. ISI’s inspection responsibilities for safeguarding also include:
 - gathering evidence on the effectiveness of safeguarding arrangements to inform inspection judgements;

¹ For further information on standards for British Schools Overseas, see [British schools overseas: standards for schools](#)

- working with statutory agencies in order to protect children from harm;
 - raising awareness in the independent sector of developments in safeguarding practice and statutory policies, including, where appropriate, how practice might be strengthened;
 - participating in serious case reviews and relevant national inquiries to enable lessons to be learned for inspection practice and to improve safeguarding practice in schools;
 - actively participating in national consultations with a view to improving safeguarding practice.
15. ISI works jointly with other agencies to safeguard and promote the welfare of children and young people.
16. For the avoidance of doubt, ISI does not investigate individual safeguarding concerns or child protection cases. The statutory authorities for the conduct of enquiries into specific child protection concerns are the police and local authority. ISI staff and inspectors must follow and advise others (schools/parents) to follow relevant local and national procedures to ensure that all allegations or suspicions of abuse or significant harm to any child are reported to local authority designated officers or the children’s services department of the relevant local authority, and/or the police as appropriate, without delay.
17. Where information indicates that a child or children may be at risk of harm, ISI may contact relevant external agencies, such as the police, local authority designated officers or children’s services for the relevant area, the Health & Safety Executive or the Charity Commission, as appropriate. The reasons for action taken, or not taken, by ISI will be recorded in the evidence of a relevant inspection or elsewhere in ISI’s records, as appropriate to the circumstances.

Where to send concerns about schools relating to safeguarding

18. The DfE, who decides what action to take in response to a concern, will receive a concern more quickly if it is sent directly to the DfE.
19. Anyone may raise a safeguarding concern about a school inspected by ISI and **should do so directly to the DfE**.
20. To complain directly to the DfE about a school inspected by ISI, visit: [Complain about a school: Private schools unless an inspection is taking place at the school](#), in which case email safeguarding@isi.net and ISI will forward it to the inspection team. If ISI receives a concern during an inspection, the inspection team will consider the broad nature of the concern in the context of inspection of the relevant standards. ISI does not investigate individual concerns.
21. Should a concern be received by ISI **outside of an inspection**, it will be passed directly to the DfE. In response to a concern, the DfE may decide to bring forward a future school inspection, or commission ISI to undertake an additional inspection to look at relevant areas of the Standards.
22. In summary:

Concern about a school (unless an inspection is happening)	Complain about a school: Private schools
Concern about a school while an inspection is happening	Contact safeguarding@isi.net

Safeguarding responsibilities at ISI

The Board:

23. **ISI's Board** is responsible for ensuring ISI complies with its legal responsibilities and meets its objectives, including to promote and safeguard the welfare, health and safety of children and young people through the provision, promotion and support of independent inspection services.
24. ISI's Articles of Association require the Board to include 'individuals with an appropriate range of skills and experience, commensurate with the Company's function and purpose, including education, inspection and safeguarding'.
25. National requirements for safeguarding and promoting the welfare of pupils in state-maintained and independent schools are set by the Secretary of State through the DfE. Each Board director recognises the central part played by the inspectorate in holding schools to account against their duty to keep children safe, and the role of the Board in ensuring the inspectorate is equipped for that task.
26. **Board level lead** - In accordance with the guidance in [Working together to safeguard children](#) the ISI Board has nominated a board-level lead for safeguarding who brings depth of expertise in safeguarding to strategic decisions, while recognising that all directors share responsibility for ensuring that ISI carries out its duties with a view to safeguarding and promoting the welfare of children in the institutions it inspects.
27. **The Chair of the Board** is responsible for ensuring:
 - that all directors support the commitment of ISI to the safety of children and young people in educational settings inspected by ISI, acknowledging the important contribution of inspection activity to keeping children safe and the centrality of safeguarding considerations in inspection activity;
 - the suitability of all directors, drawing on the executive through the Chief Executive Officer-Chief Inspector ('CEO-CI') to carry out formal vetting checks as required, as described below;
 - that the directors are suitably inducted and trained in relation to safeguarding and the role of inspection in relation to safeguarding, and are kept apprised of relevant regulatory developments; and
 - the appropriate conduct of all directors, having regard to the need to protect ISI from the risk of reputational damage as a result of proven, alleged or perceived wrong-doing in relation to safeguarding.

The CEO-CI:

28. **ISI's CEO-CI** is responsible for ensuring:
 - the suitability of those who work for or with ISI at all levels including that suitability checks required by the DfE are duly carried out prior to the appointment of inspectors; and
 - that ISI is properly resourced to fulfil those duties.

Senior Director (Safeguarding)

29. ISI's Senior Director (Safeguarding) leads on safeguarding practice in the context of inspection, including participating in the selection, training and conduct of inspectors and leading on all matters relating to the inspection of safeguarding. The Senior Director leads the safeguarding team and is responsible for liaison with Local Authority Designated Officers (LADOs) and children's social care staff and other agencies.

ISI Inspectors

30. ISI inspectors are responsible for carrying out inspections, including the inspection of safeguarding, in line with the guidance in the [ISI Handbook](#) for the inspection of association independent schools, including

residential (boarding) schools and registered early years settings and the detailed guidance provided to inspectors on the regulatory requirements set by the DfE. (Safeguarding standards for British Schools overseas are set out in Standard 8 of [British schools overseas: standards for schools](#) and for under-18s in Private Further Education (PFE) colleges in Standard 40 of the [Inspection Framework for Educational Oversight](#))

31. If inspectors observe, hear or receive information which causes them concern about the safety or wellbeing of a pupil on inspection, they should act immediately to ensure the safety of the pupil, in line with the ISI instructions for inspectors on responding to [Safeguarding concerns raised during inspection](#). Inspectors will follow the school's safeguarding and/or child protection policy. Concerns will normally be reported to the appropriate person within the school for child protection procedures to be implemented according to the disclosure, concern or allegation made, and external agencies will be informed directly if required.

Pre-recruitment and other checks

32. Inspection of schools is regulated activity that gives a person opportunity to have contact with children². There must be no concerns about the suitability to work with children of those who inspect or otherwise work for or with ISI, or govern or manage ISI, whether or not they come into direct contact with children through ISI.
33. As a condition of continuing to approve ISI as an independent inspectorate, the DfE requires that inspectors are subject to the same vetting checks as teachers.
34. ISI requires that all inspectors not currently working full time in school are signed up to the DBS update service. The policy intention is that team inspectors currently working in schools will be required to have a new DBS check and to sign up to the DBS update service³.
35. ISI undertakes regular update service checks on all inspectors at frequencies set out below:
 - For inspectors currently working full time in regulated activity in a school: **annually**
 - For inspectors currently working full time in regulated activity in a school who change employer: **on notification of change**
 - For inspectors **not** currently working full time in regulated activity in a school: **termly**
36. More information about recruitment processes for reporting inspectors is available in ISI's '*recruitment and deployment of inspectors*' policy and procedure, including the safer recruitment checks for inspectors who live and work abroad and who inspect only for British Schools Overseas.
37. ISI ensures that internal staff involved in inspection, as well as other staff and directors who do not inspect, are subject to the same level of vetting checks on appointment as inspectors, so far as legally permissible⁴. While staff are in continuous employment at ISI, no repeat checks will be undertaken unless a particular safeguarding concern is raised.
38. Board directors undergo an enhanced DBS check on appointment and on any extension of term of office.

³ Para 1(9C) and 1(10), Schedule 4 to the Safeguarding Vulnerable Groups Act 2006

³ Note: ISI will be undertaking this exercise over a period of two academic years

⁴ Barring information is only available where people work in regulated activity

Codes of Conduct

39. ISI inspectors are required to follow the Code of Conduct for inspectors which is published in the [Inspection handbook](#) on the ISI website. They are also obliged by contract to declare anything that may call into question their suitability to work with children.
40. Staff must maintain high standards of behaviour in and outside work, both in accordance with the ISI Code of Conduct for employees, and that do not call into question their suitability to work with children. Staff are under an on-going duty to report any such circumstances to their line manager.
41. All ISI Board directors must abide by the Code of Conduct for Board directors and by the Nolan Principles.

Training

Inspectors

42. Inspectors receive initial and on-going update training concerning:
 - the safeguarding duties of schools
 - how to inspect safeguarding
 - how to recognise and evaluate a culture of safeguarding.
43. They are therefore expected to have a good understanding of safeguarding concerns, including potential abuse and neglect of children and young people, which may come to light in the settings ISI inspects both in England and internationally.

Staff

44. All ISI employees must maintain a proper focus on safeguarding children, young people and vulnerable adults, and this must be reflected both in sound individual practice and in our internal policies and guidance. All permanent and contracted staff must:
 - be aware of the importance of the role of inspection in promoting the safety and welfare of children and young people;
 - contribute, as necessary, to all stages of ISI's safeguarding processes;
 - give highest priority to the safety and welfare of children;
 - know the internal processes within the inspectorate for responding to safeguarding concerns relating to children, including for responding to a disclosure to ISI by a child of abuse;
 - respond appropriately to concerns (including allegations) against staff, inspectors and against themselves.
45. ISI staff receive an initial safeguarding induction, refreshed every year.

Board

46. Board directors receive initial safeguarding training to introduce them to and familiarise them with the government's key documents and the safeguarding requirements for schools. These are currently:
 - [Keeping children safe in education](#);
 - [Working together to safeguard children](#);
 - [Prevent duty guidance: England and Wales](#)
47. As part of their induction, directors are provided with key documents including the ISI safeguarding

policy and the requirements which the inspectorate must meet to maintain approval. These include:

- [Approval of Independent Inspectorates - DfE advice 2014](#)
- [Letter of approval – DfE to the Chief Inspector of ISI, Vanessa Ward, 29 March 2023](#)
- [Memorandum of Understanding – DfE/Ofsted/ISI November 2019](#)

48. The Board receives a termly Safeguarding Report from the Executive. This includes data relating to concerns, emerging trends, risks and guidance (such as lessons arising from serious case reviews or inquiry reports). As a result, the Board's strategic decision-making is informed by up-to-date knowledge of safeguarding matters.

Sharing Information/Confidentiality

49. As stated in [Keeping children safe in education](#), information sharing is vital in identifying and tackling all forms of abuse and neglect. **The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.** Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. All information coming into ISI from whatever source (including from a parent, child, member of staff, other concerned person, the DfE, statutory agencies, and arising out of inspection) is confidential except when it is in the best interests of children to pass on the information for safeguarding reasons. In those instances, the information is passed on according to proper processes to the correct recipient. See below. All staff, inspectors and directors are bound by a duty of confidentiality.
50. Further information may be found in ISI's [Privacy Notice](#).
51. Areas of concern may be shared with a school in order to facilitate the collection of relevant evidence, but no information regarding who raised a concern or details of a concern that to the inspector's knowledge might enable that person to be identified will be shared. If a concern has been raised by the LADO, this may be shared with the school, again ensuring that no individual complainant (for example, who may have approached the LADO) is identified.

Whistleblowing

52. ISI welcomes constructive challenge. Concerns about practice within ISI, including inspection practice, or suggestions for areas where practice might usefully be strengthened and developed, may be raised without fear of detriment with the Senior Directors, the CEO-CI or Chair of the Board via the ISI whistleblowing policy (available on the ISI website and through the inspector portal). It is the duty of all members of the ISI community to raise such concerns so that they can be fully aired and improvements can be made where appropriate.

Handling allegations

53. This section deals with how ISI would handle any concerns that might emerge about the suitability of any person connected with the inspectorate to work with children.
54. **Internal reporting lines:** Suitability concerns about
- Staff members, inspectors and all other consultants and contractors of ISI must be reported to the CEO-CI
 - Board Directors must be reported to the Chair, who must keep the CEO-CI informed
 - The CEO-CI must be reported to the Chair
 - The Chair must be reported to the CEO-CI who must speak to the Vice-Chair and one other Board

Director in confidence who will take the matter forward, keeping others who may need to know appropriately informed.

55. **External reporting:** In all cases where the following criteria appear to have been met, the recipient of the information or concern (as above) will report the concern to the relevant police force or local authority via the authority's designated officer or officers.
56. **Criteria:** The information received suggests that the person has:
- behaved in a way that has harmed a child, or may have harmed a child
 - possibly committed a criminal offence against or related to a child or
 - behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children or,
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
57. **Internal procedures:** After taking external advice where appropriate (see above), depending on the nature and gravity of the concern, an individual may be removed from an inspection-facing role and/or access to the ISI 'system' may be terminated at the discretion of the CEO-CI. In the case of:
- **Staff** – internal employment processes will be applied where relevant at the discretion of the CEO-CI (e.g. disciplinary)
 - **Inspectors** – deployment may be suspended or terminated at the discretion of the CEO-CI on the recommendation of the relevant Senior Director/s
 - **The CEO-CI or Chair** – the DfE will be informed and internal disciplinary removal processes commenced.
58. Following completion of procedures, or as advised by statutory agencies, referrals will be made to the DBS or Teaching Regulation Agency, as appropriate.

Disclosures about the safety or welfare of children

59. Any ISI inspector or member of ISI staff who receives a disclosure from or about a child must not promise confidentiality but explain that in the best interests of the child the information must be passed through the appropriate channels to people who will help.

Review and reporting

60. This policy will be reviewed annually by the CEO-CI or the CEO-CI's nominated deputy, working with the Board-level safeguarding lead, and substantive amendments recommended to the Board. Minor amendments may be approved by the CEO-CI following discussion with the Board safeguarding lead.
61. **Internal arrangements:** The CEO-CI will report to the Board annually during the autumn term on the efficacy of ISI's internal arrangements for safeguarding, including matters such as:
- **Pre-recruitment checks and training** – whether the required recruitment checks and internal training are being carried out;
 - **Record-keeping** – the rigour of ISI internal record-keeping, such as those relating to recruitment checks and training;
 - **Resource** – whether the inspectorate has been provided with sufficient resource to support implementation of this policy.

62. **Inspection:** The CEO-CI will report to the Board annually during the autumn term on the efficacy of the inspection of safeguarding, including matters such as:
- **Compliance** - analysis of the rates of compliance by schools with safeguarding requirements;
 - **Quality assurance** - review and analysis of the inspection of safeguarding and, where appropriate, the identification of future developments;
 - **Resource** - linked to quality assurance - whether adequate resources have been provided to enable the inspectorate to fulfil its responsibilities effectively relating to the inspection of safeguarding.
63. **The Executive** will also provide termly summary reports to the Board in the spring and summer to keep the Board sighted on ISI safeguarding activity.

Table of substantive changes to the policy since previous review

DATE	PARAGRAPH	CHANGES
June 2024	All	All hyperlinked documents updated where relevant
	19-20, 31	Clarified wording
	49	Updated wording to reflect changes in <i>Keeping Children Safe in Education 2024</i>
	57	Clarified wording to reflect ISI practice
January 2024	1-3	Added to provide information on what to do if the reader thinks a child is at risk
	4	Added summary table of where to send concerns about schools relating to safeguarding
	8	Bullet points amended to reflect updated statutory guidance <i>Working together to safeguard children (2023)</i>
	10	Addition of 'and colleges'
	13	Removal of 'referring safeguarding concerns to the DfE, as regulator'
	16	Amended to reflect change in recording practice
	17-20	Inserted to reflect practice from 1 January 2024 on how to send concerns about safeguarding to the DfE
	Previous paragraph 20	Removed, as was legacy information
	24	Amended to reflect updated statutory guidance <i>Working together to safeguard children (2023)</i>
	26-27	Amended to reflect role of Senior Director (Safeguarding)
	28	Amended to refer to the 2023 ISI Inspection Handbook and the safeguarding standards for BSO and in the PFE EO Inspection Framework
	29	Amended to refer to the ISI policy on Safeguarding concerns raised during inspection
	previous paragraphs 27 -29	Removed to reflect change in practice
	34	Amended to reflect the safer recruitment checks for inspectors who live and work abroad and who inspect only for British Schools Overseas
	36	Amended to reflect DBS check on appointment
	37	Amended to refer to the 2023 Inspection Framework Handbook
	previous paragraph 43	Removed to reflect change in practice
	44	Bullet points amended to reflect updated statutory guidance <i>Working together to safeguard children (2023)</i>
	55	Addition of 'or terminated' to second bullet point
	Former paragraphs 57 & 58	Removed to reflect change in practice