

DISCLOSURE POLICY

The School's policy on Disclosure is derived from statutory guidance contained in Keeping Children Safe in Education (September 2019), The Education (Independent School Standards) (England) Regulations 2014 as in force from 5th January 2015, and the Boarding Schools National Minimum Standards. It is imperative that the policy be followed with rigour as any failure, in addition to potentially putting a young person at risk, could lead to punitive damages being awarded against the Governors if any such failure led to a child being abused.

As Lead Signatory, the Bursar will retain overall responsibility for the proper discharge of the Disclosure process which, on a day-to-day basis, will be undertaken by the Personnel Manager. In accordance with Section 124 of the Police Act 1997, Disclosure information is only passed to those who are authorised to receive it in the course of their duties. For Tonbridge School, such authorised persons are the Headmaster, Deputy Head Pastoral (as Designated Safeguarding Lead), Bursar, and Personnel Manager and their personal, confidential secretaries.

All employees including volunteers will be subject to an enhanced level Disclosure and Barring Service (DBS) check. There may be occasions when a DBS clearance has failed to arrive before an employee of the School begins work. In these situations, the employee may commence employment without an enhanced DBS disclosure as long as all other checks have been carried out (including identity, right to work in the UK, consideration from previous employer, references and a check of the Barred List) and a risk assessment focusing on adequate supervision before a member of staff can begin work. This needs to be reviewed after two weeks if the DBS has not been received and the relevant manager updated to ensure continued supervision.

In the case of a Housemaster on appointment, his spouse, and adult children living in boarding accommodation (or children on reaching 16), will all be subject to an enhanced DBS check.

Governors will be subject to an enhanced DBS check.

Non-cleared persons accompanying School visits involving day trips and overnight accommodation, including the spouses of members of staff or other family members over the age of 18, will be subject to an enhanced DBS check.

It is the responsibility of those organising trips to ensure that the relevant personnel e.g. volunteers, have been cleared before they are allowed to work with, associate with, or supervise children. It is also the responsibility of the trip organiser to check that employees of any Outward Bound Centre (or similar venue) visited have been vetted by their own organisation.

Instructors for courses organised by Recre8 will be subject to an enhanced DBS check on their initial appointment and signed up to the DBS Update Service. All other Recre8 staff once cleared, will be reviewed annually by the Personnel Manager and undergo new DBS clearance if they have not worked at the School for a period of three months. This will be an objective and recorded exercise which will take into account the total length of past service with the School; the ages of the children for whom they will have responsibility; what, if any, contact they have had with the School over the previous year; and their proximity/ties to the local area. For example, renewed clearance would, perhaps, be appropriate in the case of a temporary instructor, for whom a DBS check had been obtained in the past, returning after attending a distant university, where his / her status with regard to criminal convictions could have changed without our knowledge. There can be no hard and fast rules in this area, with considered, objective and recorded judgements being made in individual cases.

Certain contractors' staffs (for example, those who maintain fire alarms) require access to boarding houses in term-time. Such firms / persons will be identified by the Estates Bursar, with the staff they nominate being subject to an enhanced DBS check if they are likely to have regular, unescorted access to houses, together with the opportunity to have contact with boys.

Housemasters utilising the services of taxi firms for the movement of boys for any reason are to ensure that they utilise the services of either Castle Cars of Tonbridge (01732 363637/8), Skyline Airport Taxi Service (01732 400200 / 01892 804020) and Station Taxis (01732 363636). All companies hold Local Authority Licenses and have undertaken to ensure that only drivers holding enhanced DBS checks will be employed. In making any such bookings, this requirement should, as a matter of routine, be re-emphasised.

The School's Personnel Department, in consultation with the Headmaster's Office, Heads of academic and non-academic Departments, and the Catering Department will be responsible for initiating, checking, and recording all DBS clearances, and for notifying Heads of Departments when such clearance is received. Heads of Departments must ensure that they do in fact receive this notification.