

IOE, UCL's Faculty of Education and Society Suitability and Safeguarding Policy for Initial Teacher Education (ITE) 2024-5

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Next Review Date: 01 April 2025 coordinated by Data and Compliance Coordinator

1. Scope of document

- a) All adults working in initial teacher education (ITE), both at UCL and on placement, have an important role to play in ensuring that all learners are protected from student teachers who might put them at risk of harm. However, there are particular roles, responsibilities and processes in relation to section C1.3 of the ITT and EYITT criteria that this guidance seeks to clarify.
- b) As part of this, IOE has a responsibility to ensure that anyone enrolled on our ITE programmes has the ability and overall capacity to train to teach and will not put children and young people at risk of harm.
- c) We also have a responsibility, alongside our partners, to ensure that the health, wellbeing and rights of student teachers on our programmes, whether at IOE or on placement, are protected.
- d) This document complements the regulations set out in the UCL Academic Manual and the Initial Teacher Education (ITE) Regulations, Policies and Procedures that are updated each year. Where there are differences, this document takes precedent.
- e) This document is updated annually to take account of minor changes and updates in policy. The original document was approved by the following roles and committees in 2023:
 - ITE Admissions Office
 - ITE Academic Group
 - ITE Partnership Advisory Board
 - IOE's Director of Education Administration and Student Support
 - UCL Head of UG and ITE Admissions
 - UCL Compliance
 - UCL Director of Student Support and Wellbeing
 - UCL Director of Access and Admissions
 - Faculty Education Committee and IOE's Pro-Director Education

2. Roles and responsibilities

- a) **Head of ITE** has overall responsibility for ensuring that IOE's ITE programmes comply with Statutory Guidance outlined in the Department for Education's Initial Teacher Training and EYITT criteria. This includes ensuring that all entrants to IOE's ITE programmes are deemed suitable to train to teach. Head of ITE is accountable to **IOE Pro-Director Education** and ultimately **Dean and Director of IOE**. They liaise with UCL's designated safeguarding lead on matters requiring escalation and discussion.
- b) **Programme Services Manager (Initial Teacher Education) (PSM)** has responsibility for ensuring that IOE has carried out all pre-appointment checks that the placement setting would otherwise be required to perform, and that the student teacher has been judged to be suitable to work with children.
- c) **The Undergraduate and ITE Admissions Office** has responsibility for ensuring that the necessary checks, as determined by Head of ITE, are made on applicants before they are enrolled on ITE programmes. This ensures that enrolled student teachers have completed all necessary checks except where there are specific individual cases pending. Where there is an agreement that student teachers may enrol without all checks completed (e.g. international students who must obtain student status before they are able to complete a DBS check), the Admissions Office will inform PSM of the status of these student teachers and will continue to work with IOE while these checks are being completed.
- d) **ITE Lead on Partnership and Student Liaison (LPSL)** has responsibility for leading liaison with UCL Workplace Health / Occupational Health (OH) and acts as mediator between OH, student teachers and settings to address **individual cases** and expedite fitness to teach decisions. They also consider DBS information; check hard copies of DBS certificates; review Childcare Disqualification declarations; liaise with student teachers and settings with regard to overseas police checks (OPCs) and seek further information when considering OPC waivers. They also have responsibility for liaising with placements where student teachers are not yet fully compliant. If LPSL is absent then PSM for ITE will take on this role.
- e) **Data and Compliance Coordinator (DCC)** has responsibility for ensuring that Head of ITE, PSM and LPSL have up-to-date information on compliance. As part of this they, in collaboration with LPSL, keep up-to-date records for student teachers who are:

- a. compliant and suitable for placement.
 - b. not compliant and deemed not suitable to be on placement.
 - c. not currently compliant but are able to attend placement with the permission of the placement setting. This information is shared with Head of ITE, PSM, Programme Services Coordinator for Placements and Partnerships and LPSL. LPSL is responsible for informing placement settings.
- f) **Secondary Subject Leader or Programme Leader for Primary, FE or EYITT (Leader)** receives OH reports from LPSL and considers and institutes reasonable adjustments recommended by OH. Reasonable adjustment recommendations are shared with individual tutors. If a leader has concerns about a student teacher these are discussed between OH and LPSL. Leaders might need to share the report with Student Support and Wellbeing if further input is needed for the implementation of adjustments. Information is shared with the relevant leader who makes the decision as to whether the student teacher can be supported throughout all elements of the course. Once agreed, this information is shared with the placements and partnerships team to ensure a suitable placement is allocated.
- g) **University Tutor** discusses the OH report with the student teacher and both parties are responsible for ensuring the recommended adjustments are made. They are also responsible for overseeing the student teacher's well-being and for raising any concerns with the Subject Leader, Programme Leader or LPSL.
- h) **Mentors, including Placement Mentors and Lead Placement Mentors** take responsibility for supporting the wellbeing of student teachers, ensuring that wellbeing and the sustainable management of workload are an explicit focus of regular mentoring conversations and liaising proactively with the University Tutor where issues arise and additional support is required.

3. This document draws on the following key statutory guidance and UCL regulations

- Keeping Children Safe in Education (September 2024)
- Initial Teacher Training (ITT): criteria and supporting advice (September 2024)
- Early Years Initial Teacher Training (EYITT): criteria and supporting advice (September 2024 to be published)
- Disqualification Under the Childcare Act 2006 Statutory Guidance (August 2018)
- Home Office Criminal Records Checks for Overseas Applicants
- UCL's Academic Manual (<https://www.ucl.ac.uk/academic-manual>)
- IOE's ITE Regulations and Policies (<https://www.ucl.ac.uk/ioe/student-helpdesk/learning-and-teaching/initial-teacher-education>)
- Teacher Misconduct: the prohibition of teachers (February 2022)
- UCL's Prevent Duty (<https://www.ucl.ac.uk/srs/compliance/prevent-ucl>)

4. Duty for UCL to make a referral

IOE has a duty to make a referral to the Disclosure and Barring Service where a student teacher is removed from the programme because the student teacher has harmed or poses a risk of harm to children or young people, or if UCL would have removed the student teacher should they not have left.

Referrals should be made by the Head of ITE in accordance with the guidance below and will be done in consultation with Partners and the Local Authority Designated Officer where a student teacher's conduct relates to a teaching placement. UCL compliance will be notified that a referral has taken place.

Note the Head of ITE must also inform DfE by contacting itt.safeguarding@education.gov.uk

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

5. Deadlines for statutory requirement checks for 2024 entry

1 August 2024 statutory requirements to be met along with academic requirements

1 August 2024 overseas applicants who require a visa: deadline to meet offer conditions

From 2 September 2024 document checking on campus

13 September 2024 deadline to meet offer conditions

20 September 2024 deadline for enrolment

Compliance meetings are scheduled before and after key deadlines to review the state of play and coordinate actions.

6. Required checks for student teachers

- a) The table below outlines what checks IOE will undertake for each applicant on one of its PGCE programmes.
- b) In the case of salaried routes (EYITT Employment Based Route), the responsibility lies with the employer to ensure that the necessary checks have been carried out. The employing setting should inform IOE that satisfactory checks have been obtained. This is organised by the Academic Programmes Office (APO) by asking the employer to complete the Employer Check Suitability Form and return via the setting's email address. APO then upload details to Share Point listing the student teacher's name and checks required with a tick box per compliance check. This information is then shared with Admissions before the student teacher can enrol.

Check for fee-funded students	PGCE Programmes affected	EYITT GEB route responsibility	Notes	Who?
Verifying a student teacher's identity	All	UCL		Admissions
Obtaining (via the applicant) an enhanced DBS check	All	Employer	See Section 9 below	Admissions LPSL follows up with individual cases
Children's barred list information, for those who will be engaging in regulated activity with children	All	Employer		Admissions
Verifying the student teacher is not subject to a prohibition order issued by the Secretary of State	All	Employer		Admissions
Verifying the person's right to study/work in the UK, including EU nationals	All	UCL/ Employer		Admissions
Verifying professional qualifications	All	UCL		Admissions

Verifying that appropriate checks are carried out to ensure that individuals who work in early years, or in wraparound care for children up to the age of 8, are not disqualified from childcare	EYITT Primary (EYFS/KS1) Primary Primary (Maths), where applicable	Employer	See Section 11 below	Admissions PSM
Verifying if a person has lived or worked outside the UK, they are considered suitable to train to teach	All	Employer	See Section 10 below	Admissions LPSL follows up with individual cases
Verifying the student teacher's mental and physical fitness to train to teach	All	Employer	See Section 12 below	Admissions LPSL follows up with individual cases

- c) Where an applicant has previously undertaken but failed to complete an ITE programme, IOE will ask the applicant to provide a statement from the previous ITE provider confirming the reason for their non-completion. This information will be passed to the Head of ITE who will make a decision about the applicant's suitability to train to teach.

7. Interviews

- a) Applicants invited to interview will undergo a rigorous selection process that gives due regard to relevant parts of Keeping Children Safe in Education.
- b) Interview panels should involve a minimum of two members of staff or, with the agreement from the Programme Leader, a member of staff and a partner from a placement setting. Wherever possible, partners should be involved in the recruitment process.
- c) All interview panels should include at least one member of staff who has completed safer recruitment training. This should be updated at least once every three years.
- d) Information regarding which staff have completed safer recruitment training should be maintained by PSM.
- e) Applicants at interview should be required to show evidence of their identity to make sure that they are interviewing the applicant. Note, this is separate from the identity check completed by Admissions. This should include asking the applicant to show either their driving license, passport or EU identify card.
- f) Interviews can take place face to face or online. Applicants and interviewers will be expected to have cameras on for the duration of online interviews and suitable identify checks must be conducted as outlined in 7e.
- g) Those interviewing should agree structured questions specially relating to their safeguarding role. These should include:
 - o Finding out what attracted the candidate to the programme being applied for and their motivation for working with children;
 - o probing any gaps in employment or where the applicant has changed employment or location frequently asking them about the reasons for this; and
 - o finding out whether an applicant has previously been removed from an ITE programme and, if so, explore reasons why to make sure that they have not behaved in a way that indicates they would not be suitable to work with children.
- h) Areas that may be concerning and lead to further probing include:
 - o Implication that adults and children are equal;
 - o lack of recognition and/or understanding of the vulnerability of children;
 - o inappropriate idealisation of children; and
 - o inadequate understanding of appropriate boundaries between adults and children, and indicators of negative safeguarding behaviours.

8. References

- a) References are an important part of the recruitment process to check that applicants are suitable to work with children or young people.
- b) Applicants are required to submit two references after accepting offers.
- c) One of the references should be academic and from someone who taught the applicant at degree level, unless the applicant has been out of higher education for more than five years. The applicant can provide one professional reference in place of a second academic reference (or two professional references if the applicant has been out of study for more than five years). Note that we do not accept a character reference unless under exceptional circumstances. In this case, the Head of ITE would need to confirm to Admissions that the professional references are acceptable and meet the requirements for entry to the programme.
- d) Where possible, the email address for referees should be an academic or professional address rather than a personal address, e.g. [john.smith@university.ac.uk] rather than [johnsmith@hotmail.com].
- e) Where applicants work in employment involving single employers, e.g. a private tuition or nanny, then IOE will ask the reference to come from a professional email address that allows the identity and place of work of the employer to be verified.
- f) The suitability and content of references is checked by Admissions. Admissions may require further information if references are provided via personal email addresses, or where information provided is vague or insufficient and not in line with guidance (current guidance includes the [Get Into Teaching webpage](#) and [UCL entry requirements webpage](#)).

9. DBS Enhanced Disclosure with Children's Barred List check

- a) IOE is responsible for ensuring that all fee-paying student teachers [obtain enhanced DBS checks](#) (including children's barred list check).
- b) Applicants are asked on their application form if their DBS, when issued, is likely to contain information. Where this is the case, applicants must complete a secure online self-declaration form where they detail offences and convictions, as well as a narrative giving an explanation and later reflections. This form is passed to the LPSL. It is stored for a year and can only be accessed by sender and recipient only.
- c) The LPSL reviews this information with regards to the nature and seriousness of the offence/s, whether such behaviours may pose risks to young people, how long ago the offence took place, whether it was a one-off incident or a history of incidents, the circumstances around the incidence, and whether the explanation and later reflection suggest that the individual accepted responsibility for their actions (KCSIE, 2023). The LPSL will either waive the offence (using guidance below in 9e) and inform Admissions, or inform Admissions not to process the application and seek advice from the Head of ITE.
- d) Registered bodies such as IOE should **not** under any circumstances share details of the content of DBS certificates with third parties, such as schools or colleges.
- e) When making a decision as to whether to waive information, the LPSL will be guided by information in '[Teacher Misconduct: the prohibition of teachers](#)' (2022). This includes considering whether a conviction constitutes a relevant offence; that is, an offence that is relevant to a person's fitness to be a teacher:
 - An offence can be considered relevant even if it did not involve misconduct in the course of teaching.
 - Conviction, at any time, of a relevant offence would mean that information is **not** waived (see pages 12-13 of the Teacher Misconduct guidance and below).
 - The acceptance of a caution, involving behaviours outlined on pages 12-13 of the Teacher Misconduct guidance, would likely mean that information is **not** waived.
 - It is likely that a conviction for any offence that led to a term of imprisonment, including any suspended sentence will be considered "a relevant offence" and would **not** be waived.
 - It is also likely that a conviction for any offence that relates to, or involves, any of the following will be considered "a relevant offence":
 - violence;
 - terrorism;

- sexual activity;
- voyeurism (including upskirting);
- revenge pornography (sharing private, sexual materials, either photos or videos, of another person without their consent);
- sexual communication with a child¹;
- any activity involving viewing, taking, making, possessing, distributing or publishing any indecent photograph or image or indecent pseudo photograph or image of a child, or permitting any such activity, including one off incidents;
- child cruelty and/or neglect;
- controlling or coercive behaviour;
- harassment and/or stalking;
- intolerance and/or hatred on the grounds of race, religion, sexual orientation or any of the other protected characteristics;
- possession (including for personal use), possession with intent to supply another person, supply (selling, dealing or sharing) or production of any class A drugs;
- possession with intent to supply another person, supply (selling, dealing or sharing) or production of any class B, class C or any temporary class drugs;
- fraud or serious dishonesty;
- theft from a person or other serious theft;
- arson and other “major” criminal damage;
- possession of prohibited firearms, knives or other weapons;
- serious driving offences, particularly those involving alcohol or drugs;
- serious offences involving alcohol; or
- serious offences involving gambling;
- It is **less likely** that a conviction for offences that relate to, or involve, any of the following will be considered to be “a relevant offence”:
 - isolated minor cases of theft;
 - minor driving offences;
 - minor offences involving gambling; or
 - minor offences involving personal use of alcohol or class B, class C or temporary class drugs away from children and education contexts.
- f) If either the LPSL or Head of ITE requires additional guidance beyond that set out above, UCL’s Director of Access and Admissions should be informed who may decide to convene an Assessment Panel.
- g) Where information is not waived:

¹ For the purposes of this advice a child includes everyone under the age of 18.

- Applicants not holding an offer will be informed by Admissions that their application cannot be progressed. A decision not to accept an applicant because of their conviction(s) should be clearly documented on ITE Select.
 - Applicants who hold an offer will be informed by Admissions that their offer has been withdrawn. A decision not to accept an applicant because of their conviction(s) should be clearly documented on ITE Select.
 - Enrolled student teachers will receive notification from the IOE that they will be withdrawn from the course by PSM. A note is recorded on Portico.
- h) All DBS checks initiated via Atlantic Data will show when the certificate has been issued with the certificate number stated and whether any information was disclosed.
- i) Where DBS certificates contain information, the offer holder/student teacher will need to present their DBS certificate in person to LPSL who will check that the information on the certificate matches that stated on the self-declaration form. If the offer holder/student teacher has not completed the self-declaration, the LPSL will also need to consider the offences in line with guidance. Once this has been completed, LPSL will inform Admissions and Data and Compliance Coordinator. The offer holder/student teacher can then proceed.
- j) **Should an applicant not declare a conviction during the admissions process that comes to light prior to, or following, enrolment, then an offer of admission may be withdrawn, or a student teacher's registration may be terminated (see UCL Academic Manual).**
- k) If the Admissions Office receives notification that a student teacher holds a valid DBS registered with the Update Service, the Admissions Office will check if the applicant has uploaded their current DBS certificate (DBS Fee charged, Enhanced, Child Workforce DBS certificates only) to the Applicant Portal. Once Admissions receives their DBS certificate, they must check and confirm the certificate is registered with the DBS Update Service [here](#). If Admissions can verify their DBS Update Service subscription for a DBS Fee charged, Enhanced, Child Workforce DBS certificate (and the DBS certificate matches the individual's name fully), then the applicant will not need a new DBS check via Atlantic Data. In these cases, Admissions checks their DBS certificate is uploaded in Select and uploads a screenshot of their confirmed DBS Update Service subscription to their Docs and Uploads tab. If the certificate contains information, then the same procedure is used as outlined above.
- l) If an applicant set as "Overseas" for DBS status contacts us to say they require a Student Visa then the DBS check for CAS purposes is waived so they can apply for a visa once all other statutory requirements have been met. Applicants are told to contact Admissions as soon as they arrive in the UK so

- that Admissions can arrange a Post Office DBS check. They will need to submit the Post Office DBS in the UK before the start of their programme.
- m) Offer holders are advised to register with the DBS Update Service.
 - n) **Offer holders must retain the printed original paper copy of the DBS certificate so that it can be examined, if requested. This includes offer holders who are registered with the DBS Update Service.** Should an offer holder or student teacher lose their printed certificate they may be required to undergo an additional DBS check which they would be required to pay for.

10. Overseas police checks (OPC)

- a) Offer holders are required to upload a five-year address history to the applicant portal. Where applicants have spent six months or more in any one overseas country in the last five years, they need to obtain OPCs from each country.
- b) Where an offer holder is still in an overseas country, the OPC will need to be applied for within one month of departure date to ensure that the police certificate issued covers the period they were in the country.
- c) The applicant/offer holder/student teacher is responsible for applying for an OPC and will send Admissions evidence of this application. Applicants upload their evidence to the applicant portal.
- d) Offer holders must upload the Certificate of Good Conduct to the applicant portal as soon as this becomes available.
- e) Where an OPC has still to be issued, the LPSL will contact the student teacher to check progress of these applications and to ask them to check progress with the bodies processing applications.
- f) If an OPC has not been issued **at least two weeks before** the start of a placement, the LPSL will seek alternative methods of checking suitability so that they can make an informed decision on whether the student teacher can proceed with the placement whilst the OPC is in progress. This will involve drawing on a range of evidence and will include:
 - a. asking the student teacher for details of the time spent overseas (i.e. dates, locations, purpose of visit);
 - b. speaking with the Programme Leader or Subject Leader to confirm that they have no concerns about the student teacher's behaviour; and
 - c. performing an online search (This is important as non-UK countries have different policies relating to the types of offences on a criminal record, and how long they are stored for).
- g) If the LPSL is satisfied with the explanation from the student teacher and has received agreement from the Subject and Programme Leader to support the student teacher proceeding into placement, they will meet with Head of ITE to talk through the case. If both the LPSL and Head of ITE agree, the student teacher can attend placement. This will only happen when all other checks (OH, DBS, Barred List and Prohibition Check) have been cleared and permission has been given by the host setting. The reasons for the decision will be recorded on the Outstanding Compliance Tracker. The student teacher must provide the outstanding OPC to Admissions once available. Relevant steps will then be taken to update the compliance status of the student teacher.
- h) If the decision is taken that the student teacher cannot begin placement, the student teacher will either need to interrupt or withdraw from the programme.

11. Childcare disqualification process

- a) As a provider of ITE, IOE needs to ensure that student teachers who work in relevant childcare provision are not disqualified from doing so.
- b) The Childcare Act 2006 and associated regulations state that it is an offence for a person who is disqualified from working in early years childcare or later years childcare to do so or to be directly involved in the management of such provision.
- c) Early years childcare includes any supervised activity for a young child which takes place on a setting's premises during or outside of the normal day. A child is considered a 'young child' for the period up to 1 September after their 5th birthday. Any teaching positions in nursery and reception classes will be covered by this.
- d) Later years childcare includes provision by a school for children who are not in early years but who are under the age of eight, which takes place on a school's premises outside of the normal school day (referred to as later years wraparound childcare). This includes wraparound care before and after the school day, such as breakfast clubs and after school care, but does not include teaching during the school day or extended school hours for co-curricular activities such as sports activities.
- e) As part of our compliance checks, IOE needs to ask student teachers/offer holders/applicants who will work in relevant childcare provision to read relevant documentation relating to childcare disqualification and to complete a declaration. This is as follows:

Programme	Prior to enrolment	Prior to placement in reception or nursery
EYITT Mainstream PGCE	Declaration	
EYITT GEBs PGCE	Employer to confirm that this has been done	
Primary (EYFS/KS1 full-time) PGCE	Declaration	
Primary (Specialist Mathematics) PGCE	Signed to confirm student has read regulations and understand need to disclose	Complete declaration form
Primary PGCE	Signed to confirm student has read regulations and understand need to disclose	Complete declaration form

- f) EYITT Mainstream and Primary EYFS/KS1 applicants will complete the declaration form relevant to the early years childcare, whilst Primary Specialist Mathematics and Primary non-specialist applicants will complete the declaration form relevant to the later years. If Primary Specialist

Mathematics and Primary non-specialist applicants are subsequently placed in an early years setting, they will be asked to complete an additional declaration form (as per Primary EYFS/KS1 applicants) by the Primary Programme Services Coordinator.

- g) If a salaried student teacher is disqualified from childcare, settings should inform the IOE of this. Where student teachers are not on a salaried programme, it is the responsibility of IOE to conduct the relevant checks to ensure that student teachers placed in settings are not disqualified from childcare or that they have obtained a waiver from Ofsted.
- h) **If any of the disqualification criteria apply to an applicant then they will not be able to enrol on the affected ITE programme at IOE unless they have a waiver from Ofsted before the commencement of the programme.**

12. Fitness to train to teach assessment and Occupational Health

- a) Everyone offered a place on a PGCE at IOE must be deemed as fit to train to teach. This is a requirement of The Education Act (2002). The aim of the Fitness to Teach requirements is to ensure that a student teacher has both the physical and mental fitness to perform their duties without putting children and young people at risk. At the same time, the Equality Act (2010) places an obligation on IOE to take active steps to reduce discrimination of student teachers with a disability, impairment, mental or physical health condition, and to make reasonable adjustments to learning, teaching and assessment. We will therefore look at each case individually when making a decision regarding an individual's fitness to train to teach.
- b) The activities that a teacher must be able to perform are set out in the Education (Health Standards) (England) Regulations 2003. This outlines a teacher's duties as follows:
- Planning and preparing lessons and courses for children;
 - Delivering lessons to children (including distance learning or computer-aided techniques);
 - Assessing the development, progress and attainment of children;
 - Reporting on the development, progress and attainment of children;
 - An activity which assists or supports teaching;
 - Supervising, assisting and supporting a child;
 - An administrative or organisational activity which supports the provision of education; and
 - An activity which is ancillary to the provision of education.
- c) To determine an applicant's Fitness to Teach, all applicants who are offered a place at IOE must complete a health questionnaire for scrutiny by workplace health. This will then be signed off as fit to teach or further information will be requested.
- d) If applicants disclose a disability, medical or mental health condition then workplace health will arrange an appointment with a medical practitioner and/or request further medical information.
- e) If a student teacher fails to disclose a condition which affects their Fitness to Teach or gives false information, then it may result in their withdrawal from the course by Head of ITE.**
- f) Once further information is received, letters or OH reports are produced. The letters (either 'Fit to Teach' or 'Fit to Teach with Adjustments') are for information only and are sent to the LPSL and passed on to relevant Subject or Programme Leaders. OH reports recommending fit to teach are shared with the LPSL at IOE.

- g) The LPSL receives OH password protected reports and requests permission from the applicant/offer holder/student teacher to share the report with the Programme or Subject Leader and the student teacher's personal tutor.
- h) On receipt of this permission, the OH report and password are passed separately to the relevant person with a request to confirm support. At this stage, there may be queries about the adjustments recommended in the report before the Programme or Subject Leader confirms that they can support the student teacher. These queries may result in further clarification of what the adjustments entail or in changes to the recommended adjustments.
- i) At times, interim OH reports are issued where workplace health is waiting for GP or specialist reports. The LPSL will monitor this, e.g. asking OH and the student teacher to contact GPs/specialists to check progress.
- j) The Programme or Subject Leader will inform the Placements team if the OH report includes any adjustments about commuting to placements (e.g. journey length or mode of transport).
- k) Confirmation is subject to review in the light of the student teacher's progress and the ability of IOE and Placements staff to support that progress.
- l) [Referrals should be made to OH](#) if the student teacher's health or circumstances change and/or give rise to concern.
- m) When student teachers have been assigned to University Tutors and near the start of term 1, University Tutors and students need to review the adjustments recommended in OH reports to check that they have been, or can be, put into place.
- n) Student teachers are routinely advised to seek support from Student Support and Wellbeing (SSW). The University Tutor should check whether this has taken place, what support has been agreed and if a SORA is being applied for. Although the SORA is for academic adjustments, some of these adjustments might be applicable when on placement. SSW ensures that the wide range of student support is available outside normal office hours so that student teachers can access this when on placement.
- o) Once on placement, it is the responsibility of student teachers to decide whether to share details of support needs (including their SoRA) with their Lead Placement Mentor/ Placement Mentor in order to ensure that the placement is aware of the support needed. If student teachers need support, they can discuss this further with their University Tutor, with LPSL and with SSW/OH, as appropriate.
- p) Where there are concerns raised regarding the student teacher's Fitness to Train to Teach then the Fitness to Practise Process will be initiated (See Teacher Education (ITE) Regulations, Policies and Procedures).

13. ITE compliance communications with placements

- a) Data and Compliance Coordinator (DCC) will keep an up-to-date spreadsheet (Outstanding Compliance Tracker) that outlines what checks, if any, student teachers are missing and what, if any, communication has taken place between the LPSL and the placement setting.
- b) DCC will produce monthly snapshot reports of compliance against the statutory checks (number and percentage of applicants who have met each requirement up to that date). These reports will enable Head of ITE, PSM, LPSL and ITE Academic Group colleagues to track overall progress during the recruitment and enrolment cycle.
- c) Compliance meetings are scheduled to coincide with the key dates in the enrolment cycle and escalation plan. Admissions, LPSL, DCC, PSM, Placements Coordinator and Programme Services Coordinators (all phases) are expected to attend these meetings. The Head of ITE will be invited to meetings at the most pivotal times (i.e. the final meeting taking place before the de-registration date and the final meeting taking place before the placement start date). These meetings provide opportunities to look at outstanding compliance checks and to understand which offer holders can (not) attend teaching and/or placement, as well as any upcoming actions or deadlines.
- d) The placements team confirms in writing with placement hosts that a student teacher's criminal record check, including a check of the children's barred list, has been completed and the individual has been judged by IOE to be suitable to work with children. **Settings can record this fact in their central record, although they are not obliged to do so.**
- e) IOE should **not** provide any further information beyond the level, date and type of check completed to settings. However, settings may ask to see a student teacher's DBS and are entitled to do so. If partners have any questions regarding a student teacher's DBS they should contact the LPSL.
- f) Where a DBS Certificate has not yet been issued, **but all other checks have been completed**, the LPSL will contact the placement setting to request whether the student teacher can start the placement on the understanding that the student teacher will need to be supervised or whether the start of placement must be delayed till the receipt of DBS Certificate. The LPSL will update Outstanding Compliance Tracker.
- g) Where fitness to train to teach has not yet been confirmed, the LPSL will contact the placement setting to inform them of this and establish whether the student teacher can start the placement on the understanding that they will need to be supervised or whether the start of placement should be delayed until confirmation of fitness to teach. The LPSL will update Outstanding Compliance Tracker.

14. In-year support and safeguarding concerns, including on placement or at IOE

- a) All student teachers, at the start of their placement should be provided with:
- the child protection policy;
 - the staff behaviour policy (sometimes called a code of conduct);
 - information about the role of the designated safeguarding lead;
 - a copy of Keeping Children Safe in Education.
- b) UCL support services are all free and open to all students at IOE. Student teachers can access support online, in person at the UCL Student Enquiries Centre and 24/7 via a student support phone line.
<https://www.ucl.ac.uk/students/support-and-wellbeing>
- c) Where there is a concern about a student teacher's wellbeing or safety at IOE or on placement, please complete a [Student of Concern form](#) and the University Tutor should be informed, if not already aware. If the student is seriously unwell, or you believe they are in immediate danger of hurting themselves or others, phone 999 or take them to the Accident and Emergency department of the nearest hospital.
<https://www.ucl.ac.uk/students/support-and-wellbeing/if-you-are-concerned-about-student>
- d) UCL staff should use UCL's Student Triage and Referral Tool if they have concerns about a student and need guidance on how to respond. This includes guidance for incidents requiring an urgent response such as suicidal thoughts, self-harm and panic attacks.
<https://www.ucl.ac.uk/srs/student-triage-and-referral-tool>
- e) UCL provides 24/7 support through its Student Support Line. Note, if a student is in crisis i.e. is in immediate danger of hurting themselves or others they should be taken directly to A&E or 999 should be called, as appropriate.
<https://www.ucl.ac.uk/students/support-and-wellbeing/mental-health-and-wellbeing/ucl-student-support-and-wellbeing-phone-lines>
- f) Where a student teacher's health is causing concern on placement, they should be referred to [Occupational Health](#) with their consent by a member of IOE's programme team. Refusal by a student teacher to attend an appointment or to share the OH report will trigger a Fitness to Practise investigation.
- g) Where a student teacher's behaviour may be a safeguarding concern for the wellbeing of others, either on placement or during time at IOE, IOE's ITE Safeguarding Process should be followed (see Figure 1). A Fitness to Practise referral form should be completed by a member of IOE's programme team and e-mailed to the Head of ITE - copying in IOE Quality. This form is available to IOE staff in the [IOE Quality Hub](#). This may be the first step in a Fitness to Practise investigation.

Procedure to follow if safeguarding concerns or allegations arise in relation to student teachers. V2.0

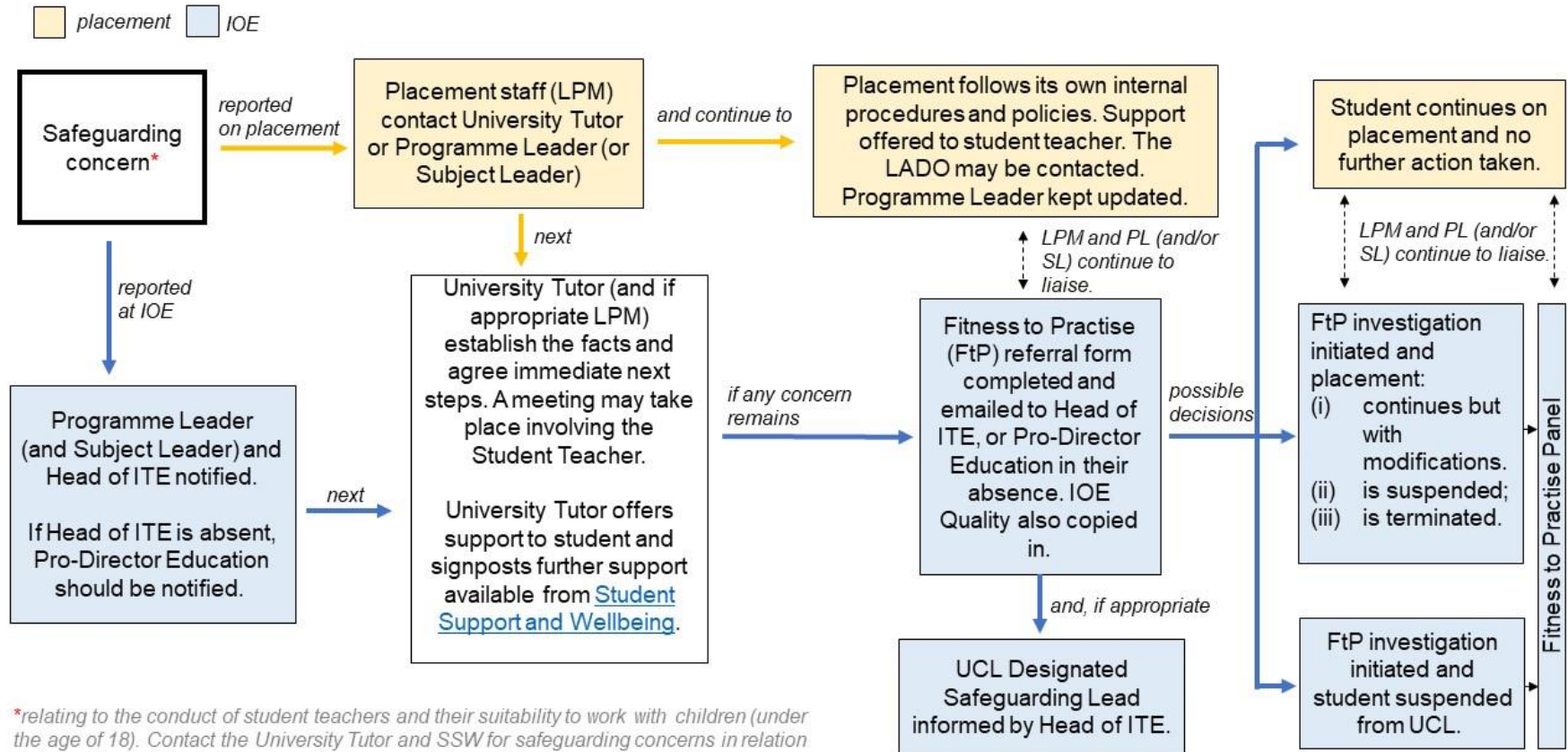


Figure 1 Procedure to follow if IOE staff or mentors have safeguarding concerns in relation to a student teacher's conduct while at IOE or on placement.

- h) If the behaviour reported in (g) relates to behaviour on placement the Partner should deal with any concerns in accordance with their own respective policies, regulations and procedures, always in co-operation with IOE.
- i) **In line with Keeping Children Safe in Education, if a student teacher is the subject of any allegation and/or investigation it is important that IOE and placement staff offer welfare support throughout the process. For example, through the University Tutor and by signposting specialist help through UCL's Student Support and Wellbeing.**
- j) If IOE partners have any safeguarding concerns regarding a member of IOE staff they should contact the Head of Initial Teacher Education in the first instance, or IOE's Pro-Director Education.
- k) Where anyone is being bullied, harassed or is the victim of sexual misconduct, this should be reported (anonymously or with contact details) using UCL's Report and Support (<https://report-support.ucl.ac.uk/>).

15. Returning student teachers

- a) Student teachers that interrupt or are away from the programme for a sustained period of time are required to complete new safeguarding and suitability checks as part of the Return to Study Process. The requirements for the return to study checks are determined by the length of the interruption. Student teachers will be advised about the relevant requirements (i) before they go on interruption by their University Tutor or Subject/Programme Leader when they meet to complete a Return to Study Plan and (ii) during the Return to Study Process.
- b) Student teachers that interrupt for a period of less than six months will be required to submit a self-declaration indicating that their circumstances in relation to all safeguarding checks remain unchanged. The only exception to this is when student teachers interrupt on medical grounds. In these cases, student teachers will be referred to SSW and asked to complete an Occupational Health questionnaire before returning to study.
- c) If student teachers interrupt for a period of six months or more, updated compliance checks will be required. PSM is responsible for ensuring these checks have been carried out. The earlier sections of this policy outline what relevant checks will need to be completed. Where any checks are outstanding upon return to IOE teaching or return to placement, the LPSL will support communication between the relevant parties involved in the student's return to study.
 - DBS Enhanced Disclosure with Children's Barred List Check – in the first instance, UCL will use records from the original enrolment to check if a valid clearance is still available on the Update Service. Where UCL is unable to confirm the clearance using those details (e.g. the DBS is no longer active on the Update Service), the returning student teacher will be required to obtain a new DBS certificate. A scanned copy and original paper copy will need to be presented to UCL to meet the requirement of the returners process.
 - Relevant Childcare Disqualification forms will need to be signed and returned for required phases of study.
 - Occupational Health questionnaire will need to be completed by the returning student teacher, and the student teacher will need to be confirmed as Fit to Train to Teach.
 - Any compliance checks outstanding from the original enrolment will also need to be completed (e.g. If the interruption started before all compliance checks had been completed).