

## INDEPENDENT PERSON POLICY

This document which applies to the whole college inclusive of boarding is publicly available on the college website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the college office.

### Status and Availability

This policy applies to the whole college, including boarding. It is publicly available on the college website and, upon request, a copy (which can be made available in large print or other accessible formats if required) may be obtained from the college office.

Reviewed: January 2026  
Next Review: January 2027

### Signed

David Game  
CEO and Founder

John Dalton  
Principal

### Scope

All who work for, volunteer at, or supply services to the college have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal college hours, including activities away from college. All new employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this by signing the Policies Register.

### Legal Status

Complies with The Education (Independent School Standards) (England) Regulations currently in force and the National Minimum Standards for Boarding Schools (April 2015), in particular Standard 2.3.

### Monitoring and Review

These arrangements are subject to continuous monitoring, refinement, and audit by the Principal, who will undertake a full annual review, inclusive of its implementation and the efficiency with which the related duties have been implemented. This review will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed arrangements and it will be made available to them in writing or electronically.

### Introduction

The school has a system whereby any child who wishes to talk to an independent adult can do so. The Independent Person system is confidential. The Independent Person is under no obligation to inform the school of any contact unless there is a safeguarding concern (or risk of harm) whereby the Independent Person must contact the Designated Safeguarding Lead (DSL) without delay in line with the Child Protection Policy.

David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

The Independent Persons' contact details are displayed in every boarding house and pupils are made aware of the role of the Independent Person – to act on behalf of the pupil in guiding the pupil to handle a situation or issue advice appropriately and safely.

This policy should be used in conjunction with the Child Protection Policy. Standard 2.3 of the National Minimum Standards for Boarding Schools (NMS), April 2015, requires schools to appoint an Independent Person (outside staff and leadership structures) who is available to students who may wish to discuss concerns or problems. This is in addition to support available through the implementation of the following policies:

- Child Protection Policy
- Anti-bullying Policy
- Enabling Students to Raise Problems and Concerns Policy
- Reporting of Concerns or Allegations of Harm to Students Policy

Independence and Conflicts of Interest (Added for Inspection Clarity)

The Independent Person:

- is not employed by the college;
- has no operational, disciplinary, complaints-handling, governance, or management role within the college;
- must declare any actual or perceived conflict of interest, which will be reviewed by the Principal/Head of Boarding/DSL as appropriate.

Independent Person

- Michael Kahn MA (Oxon)
- [independentperson1@davidgamecollege.com](mailto:independentperson1@davidgamecollege.com)

Document No. 23

Policy Aims

The aims of the policy are:

- To provide staff information as to how students can access the Independent Person
- To enable students to obtain support and guidance when they feel unable to speak with a member of staff

Training

The Independent Person will receive a copy of the Child Protection Policy and all related policies. It is expected that the Independent Person will have Level 3 Safeguarding training, which will be recorded on the Central Training Register. The Independent Person will be made aware of the Designated Safeguarding Lead and will be provided with contact details.

The Independent Person will be briefed on confidentiality and the circumstances in which confidentiality must be breached, in line with statutory guidance (including Keeping Children Safe in Education, as updated from time to time).

Person Specification

Ideally, the Independent Person will be someone who:

- Demonstrates approachability to children aged 14–18
- Has experience working with children
- Has experience listening to and supporting children
- Demonstrates behaviour (verbal and non-verbal) that encourages children to make contact
- Has good communication skills and understanding of British and American English
- Is familiar with UK cultural and regulatory expectations for appropriate interaction with children

David Game College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

## Organisation and Management (Independent Person Arrangements)

The following outlines the organisation and management of the Independent Person:

- The college provides an Independent Person for all its students.
- The Independent Person is known to the college management, has a working knowledge of the college, but is not employed by the college and is independent of college management structures.
- The contact details of the Independent Person are displayed on notice boards in the Boarding House and included in student information materials.
- Students are made aware of the role of the Independent Person – to guide and support the student to handle a situation appropriately and safely.
- The Independent Person will make termly visits to the college, with opportunities to speak informally with students.
- Students may speak to the Independent Person privately if they wish. Individual meetings will take place in a private but easily observed location.
- The Independent Person will not guarantee secrecy and will act in accordance with the Child Protection Policy currently in force.
- The Independent Person will have discussed role expectations with senior management and will be provided with relevant policies including anti-bullying, behaviour management, and child protection.
- The Independent Person will understand they have a duty to report and follow up any issue that indicates a safeguarding risk, including referral to the DSL and, where necessary, external agencies in accordance with safeguarding procedures.

Additionally, students can contact the Office of the Children’s Commissioner in case of problems or distress on: 020 7783 8330. These details are also located within the student handbook.

## Safeguarding Responsibilities (REINSTATED AND STRENGTHENED)

The Independent Person has safeguarding responsibilities and must:

- Know the identity of the School’s Designated Safeguarding Lead (DSL) and Deputy DSL.
- Proactively be alert to indicators of potential safeguarding issues and report these immediately in accordance with the School’s procedures.
- Be aware of, and comply with, the School’s Safeguarding (Child Protection) Policy and related procedures.
- Attend safeguarding training relating to the safeguarding of children, as required by the School.
- Engage in safe practice and professional conduct to safeguard children and mitigate against misunderstanding or situations being misconstrued.
- Understand that safeguarding responsibilities override confidentiality where a student is at risk of harm or may be harmed, and that concerns must be shared with the DSL without delay.
- Recognise that the School is fully committed to safeguarding the welfare of children and young people and expects the same from its volunteers, employees, and representatives.

## Supervision

Supervision arrangements will be agreed with the Head of Boarding. The Independent Person may also arrange peer supervision outside the college where appropriate. The Independent Person will receive ongoing support and guidance from the Head of Boarding as required, while maintaining independence of the role.

(Added for clarity): As a minimum, the Head of Boarding will meet the Independent Person at least once per term (or more frequently if required) to review practical arrangements, accessibility to students, and any systemic themes (without breaching individual confidentiality unless safeguarding requires disclosure).

## Job Context

The Independent Person must be child focused. The function is to complement the work of boarding staff and parents. The Independent Person must behave in an anti-discriminatory manner and remain open-minded, fostering appropriate professional curiosity and healthy scepticism.

## Knowledge, Experience and Training

The Independent Person should have qualities, skills, experience and/or qualifications enabling them to undertake work professionally with children. These may include:

- a. Understanding and empathy for the needs of school age children and adolescents;
- b. Understanding and appreciation of the difficulties caused by living away from home;
- c. Ability to work flexibly with a variety of adults and children;
- d. Understanding of Good Care Practice and principles;
- e. Appreciation of the Children Act 1989, Children Act 2004, the National Minimum Standards and other relevant legislation;
- f. Qualifications/experience in counselling or other relevant disciplines.

## Problems and Decisions

The Independent Person will consult and work with the Head of Boarding (and DSL where required), boarding staff and students. They will work within all school policies and procedures. All grievances or disputes should follow the procedure and guidance within the School's policies.

## Duration

The initial arrangement is for 12 months. After 12 months the arrangement will be reviewed by the Headteacher/Principal, Head of Boarding and DSL. If the Independent Person is unable to continue with the role, they should contact the Head of Boarding as soon as reasonably practicable.

## Notes on Independent Persons

The National Minimum Standards for Boarding Schools (NMS) require schools to appoint an Independent Person, as a possible "safety valve" for pupils with concerns or problems.

The Independent Person will respect confidentiality but will not guarantee secrecy. They will act in accordance with the School's Child Protection Policy and safeguarding procedures, which reflect the National Minimum Standards.

The role is voluntary, although reasonable expenses for travel may be agreed in advance.

## Appointment Procedure (NMS-aligned)

The following procedure is to be followed in appointments:

1. Appointment procedures will follow safer recruitment and NMS expectations.
2. The position is subject to the usual child protection, welfare, conduct and whistleblowing requirements.
3. Provide an appropriate role description and induction/briefing.
4. Invite the Independent Person to relevant in-house safeguarding training.
5. Make clear the role is independent of school management lines, while still subject to safeguarding expectations and school organisation for access and student awareness.
6. Ensure the Independent Person understands school norms and expectations, including behaviour boundaries.
7. Consider and manage perceptions of any other roles the Independent Person may hold (e.g. governor, doctor, clergy, counsellor, local dignitary, police).
8. The Independent Person must have an enhanced DBS check (including barred list check where appropriate) in line with the school's safer recruitment processes.
9. There must be clear rules on confidentiality and the duty to share information where a safeguarding concern exists; there must be no absolute guarantees of secrecy.
10. Clarify any interaction with the Independent Person's other professional duties/codes (e.g. medical, religious, counselling), ensuring safeguarding remains paramount.