Nottinghamshire Safeguarding Children in Education: Self-audit tool 2018-19

This guidance supports completion of the annual safeguarding self-audit 2018-19. It has been updated to reflect changes in the statutory requirements within Keeping Children Safe in Education (KCSIE) 2018.

In order to complete the safeguarding self-audit you may find it helpful to consult DfE Keeping Children Safe in Education 2018 which comes into force from the 3rd September 2018. KCSIE 2018 sets out what schools and colleges should do to safeguard children.

This self-audit guidance references the relevant paragraphs and appendices from KCSiE 2018 to the 28 audit questions. As the guidance in KCSiE 2018 has been clarified and strengthened, it is advised that those with designated safeguarding responsibilities read the content of DfE KCSiE 2018 in full. Link: https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

As a reminder, DIE KCSiE 2018 Part One should be read by all staff; The Senior Designated Safeguarding Lead should ensure that all staff fully understand the responsibilities the statutory guidance places upon them to keep children safe.

EVIDENCE

The self-audit checklist provides space for supporting evidence to be detailed. When your setting’s safeguarding practices are inspected, either by Ofsted, or as part of an external safeguarding review, this recording of evidence will be helpful. Governing bodies, Academy Trusts and Management Committees should take an active role in understanding how statutory requirements are managed within their setting, and how these arrangements are reflected in their setting’s child protection policy. Where any shortfalls in policy or practices are identified through the self-audit, settings are advised to generate an appropriate safeguarding action plan.

Q1. GOVERNOR SAFEGUARDING LEAD (KCSiE para 45/46)

This question reflects guidance in KCSiE 2018 that there are mechanisms in place to help staff to understand what they need to do to ‘discharge their roles and responsibilities’. They must have regard to KCSiE 2018 to ensure that the policies, procedures and training in their setting are effective and comply with the statutory requirements of the law at all times. Schools and colleges should determine that the person with lead responsibility for safeguarding arrangements in their setting should be a member of the senior leadership team. Governing bodies, Academy Trusts and Management Committees should ensure all staff read and understand Part One of KCSIE 2018.

Governors are encouraged to attend the school or academy’s whole school child protection/safeguarding training. Training for the Chair of Governors and Named Child Protection Governor will be provided on a termly basis at venues around the County and can be booked through Governor Services or NCC Learning and Workforce Development.

Q2. WHOLE SCHOOL CHILD PROTECTION POLICY (KCSiE para 47/48)

The school should have an effective child protection policy that has been agreed by the Governing Body and is available to parents on request and published on the school website. As a minimum the policy should be updated annually, and the policy should reflect:

- The Education Act 2002
- HM Working Together to Safeguard Children 2018
- DIE KCSiE in force from 3rd September 2018
- The NSCB guidance
- NCC Pathway to Provision version 7 (to be revised November 2018)
A template policy with additional guidance and entitled ‘Whole School Policy on Child Protection’ is available on the Safeguarding section of NCC School’s Portal, and a copy is also available on the NSCB website: NSCB Resources

Q3 SAFEGUARDING POLICIES AND PROCEDURES (KCSiE para 1/53)
As a minimum, all staff (teaching and non-teaching) should read and understand Part One of KCSiE 2018. All newly appointed staff should be provided with a copy at their induction and before being asked to work with children. Supply staff and volunteers are also required to be conversant with what to do should they be concerned about a child’s wellbeing, or when abuse or harm is disclosed to them. The Snr DSL is required to ensure that all staff have suitable training, and are kept up to date with any changes to statutory guidance, or to the schools own safeguarding arrangements. (KCSiE 2018 para 76, 77 and 78)

All school staff should be aware of the arrangements which support safeguarding, including the child protection policy, the staff behaviour policy (code of conduct) and the role of the designated safeguarding lead. The staff behaviour policy should include acceptable use of technologies, staff/pupil relationships and communications including the use of social media. When drafting the staff behaviour policy, schools and colleges should bear in mind the offence under section 16 of The Sexual Offences Act 2003, which provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is said to be consensual. All staff should be aware of the ‘whistle blowing’ policy and procedures and how to escalate concerns.

Staff should have the opportunity to contribute to reviewing and revising school policies and procedures. (KCSiE Para 78)

Q4 CHILD PROTECTION PROCEDURES (KCSiE 2018 para 13, 54, 56 and throughout the guidance)
The child protection policy should describe procedures which are in accordance with government guidance KCSiE 2018, and should refer to locally agreed inter-agency procedures put in place by the Nottinghamshire Safeguarding Children Board (NSCB). The policy should be reviewed and updated annually (as a minimum), and be available publicly, either via the school or college website or by other means. The policy should be specifically tailored to reflect the setting’s particular safeguarding arrangements, and the setting’s child population.

DfE KCSiE 2018 has broadened its guidance for specific vulnerable groups, to reflect the changes within society and areas of safeguarding concerns. These safeguarding factors also include incidents and behaviours associated with factors outside of the setting. All staff, but especially the DSL’s should consider when such incidents and behaviours occur. This is known as contextual safeguarding. (KCSiE 2018 para 49, 50,51,52,53 and Annex A)

Schools, Academies and Colleges are encouraged to adopt the Nottinghamshire Safeguarding Children Board Inter-agency Safeguarding Children Procedures NSCB safeguarding procedures. These procedures are available in electronic format only; it is advised that these should not be downloaded and printed off as they are regularly subject to change.

Q5 DESIGNATED SAFEGUARDING LEADS FOR CHILD PROTECTION (KCSiE para 10,26 Annex B).
The Snr Designated Safeguarding Lead should be a senior member of staff from the school or college leadership team, who takes lead responsibility for safeguarding and child protection. This should be explicit in the role-holders job description. In a primary school this role is often undertaken by the Head Teacher. The Snr DSL should receive appropriate supervision from the Head teacher or Exec Head teacher/ Principal including CPD. (See Annex B of KCSiE 2018 for the broad areas of responsibility and activities.)
There should be at least one Deputy DSL and they must be trained to the same standard as the DSL.

Whilst activities can be delegated, the ultimate lead responsibility for safeguarding a child remains with the Snr DSL and this responsibility should not be delegated. The Snr DSL and any Deputy DSL should liaise with the local authority and agencies as informed by KCSiE 2018 and Working Together to Safeguard Children 2018.

**Q6 COVER ARRANGEMENTS FOR THE DESIGNATED SAFEGUARDING LEAD**
(KCSI E para 10, 60 and Annex B)
This clarifies the cover arrangements for the Snr Designated Safeguarding Lead. During term time the Snr DSL and/or a Deputy DSL should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools and colleges and the Snr DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities. Training should be undertaken by those with designated safeguarding lead status before taking on the responsibility. (See Annex B of KCSI E 2018 for further training requirements.)

**Q7 DESIGNATED SAFEGUARDING LEAD TRAINING**
(KCSI E para 76, 77 and Annex B)
This question reflects the requirement for the DSL to update their knowledge and skills at least annually (for example through e-bulletins or meeting other safeguarding leads, reading, etc.) to provide them with the knowledge and skills required to carry out the role. The more formal training should be updated every two years.

It is highly likely that the more informal updating of knowledge is already happening, for example by attending the DSL Focus Group or reading articles. It might be helpful to keep a personal record of some of this activity.

**Q8 CHILD PROTECTION TRAINING**
(KCSI E Part One and para 76, 77)
There is a requirement for all staff members to receive safeguarding and child protection updates at least annually and to give staff the opportunity to contribute to and shape safeguarding arrangements and the child protection policy. All staff members should undergo safeguarding and child protection training at induction.

**Access to training**
- Safeguarding Children – The role of the Designated Safeguarding Lead. This can be accessed via the Workforce Development Service via safeguarding.training@nottscc.gov.uk or 01159 773065/0115 9772347.
- Inter-agency training ‘Working Together to Safeguard Children’ This is provided by the Nottinghamshire Safeguarding Children Board (NSCB), details of courses and seminars available can be found at NSCB training including online training.
- Whole school training. This can be accessed via the Workforce Development Service via safeguarding.training@nottscc.gov.uk or 01159 773065/ 0115 9772347

The Designated Safeguarding Lead Focus group meeting provides an opportunity for DSLs to network and also access presentations from key safeguarding leads, guest speakers and organisations and agencies linked to safeguarding. The DSL Focus group is organised by the Safeguarding Children in Education Officer (SCIEO) on a half termly basis throughout the County.

**Q9 CONCERNS ABOUT PRACTICE/WHISTLE BLOWING**
(KCSI E para 40,41,42)
There should be a culture that all staff are able to raise concerns about poor or unsafe practice, and that concerns will be taken seriously by the leadership team. Appropriate whistleblowing policy and procedures, which are suitably reflected in staff training and staff behaviour polices, should be in place to enable this.
The policy should point staff to a member of the leadership team with whom they can raise concerns and should also include reference to the NSPCC whistleblowing helpline for staff who do not feel they can raise concerns internally.

**Whistleblowing advice line NSPCC**

**Q10 LOOKED AFTER CHILDREN (KCSiE para 93,94,95 96,97,98,99,101)**

Appropriate staff should have the information they need in relation to a child’s looked after legal status, contact arrangements, and Parental Responsibility (PR), including the level of authority delegated to the carer by the Local Authority. The Designated Teacher for LAC should also have details of the child’s social worker and the name of the link with the Virtual School. The Designated Teacher for LAC should have appropriate training to be able to carry out the responsibilities to ensure the educational achievement of children who have LAC status is promoted.

The Snr DSL for safeguarding should work very closely with the Designated Teacher for LAC.

The Designated Teacher for LAC should work with the Virtual School team to discuss how Pupil Premium plus funding can best be used to support the progress of looked after children in the school, with the aim of meeting the needs identified in the child’s Personal Education Plan (PEP). Revisions to KCSiE 2018 also inform the Designated Teacher for LAC that they should liaise with the Aftercare Advisor when required and for children with LAC status who have left Local Authority care.

**Q11 CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (KCSiE para 18, 29,102)**

The child protection policy should reflect the additional barriers that exist for children with SEND when recognising abuse and neglect. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury are (wrongly) explained by the child’s disability;
- children with SEN and disabilities can be disproportionately impacted by acts like bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

The child protection policy reflects the additional barriers for this vulnerable group and staff are conversant with the Early Help offer and the NCC Pathway to Provision v 7 2018. The policy should describe or refer to the additional pastoral support which is in place for children with SEN and disabilities.

**Q12 NEW 2018/19 VULNERABLE GROUPS (KCSiE para 35, 51, 52, 57, 90, 93 to 95101181 Part 5, Annex A, and C)**

All staff should be fully conversant with the statutory requirements for responding to children with specific vulnerabilities, and know when mandatory referring or reporting is required these, including: Private Fostering, Honor based violence, Child criminal exploitation; County lines, Female Genital Mutilation (FGM), Forced Marriage, Missing Children, Children Missing Education, Young Carers, Looked After Children, Care leavers, Children in the Court system; Children with family members in prison, Contextual Safeguarding, Peer on Peer Abuse.

All schools, academies and colleges should have policies and procedures in place and these should be referenced in the school, academy or college’s child protection policy and known to all staff and volunteers in order to keep children safe, and free from harm and abuse.

**Q13 COMPLAINTS (KCSiE 2018 Part Two Leadership and Management)**

The school/college should have a Formal Complaints Policy which is made known and available on the school/college website. The school, academy or college should have a comprehensive system in place for children and families to make complaints, so that parents/carers and children know that they will be listened to and their concerns robustly
addressed. A review of the number of complaints made during previous academic year 2017/18 should be made to check whether similar complaints raised reflect a pattern of concerns which needs to be addressed at a systems level within the organization. The review of complaints should include complaints which have been made to Ofsted as Ofsted Qualifying Complaints, and how these were addressed within the schools complaints procedure.

**Q14 SAFER RECRUITMENT** (KCSiE 2018 para 84 Part Three Safer Recruitment, NCC HR)

Safer Recruitment, which is an integral part of safeguarding, should continue to remain high profile. Schools must create a culture of safe recruitment and safe working practices, and adopt recruitment procedures that help deter, reject or identify people who might abuse or harm children. It is thus imperative that as part of a written recruitment and selection policy and procedures that all appropriate checks are carried out on staff and volunteers who work with children. This should be evidenced through the maintenance of a single central record. KCSiE clarifies that anyone who is undertaking ‘teaching’ work has had a prohibition check e.g. in academies, teaching can be undertaken by unqualified teachers and Prohibition Orders can be made on anyone not just qualified teachers.

Further advice and guidance is provided by Schools HR via the NCC Schools HR Duty Desk tel: 0115 9774433 and on the HR School’s Portal. The Ofsted checklist which HR produced is a helpful audit tool against this broader question.

**Q15 SAFER RECRUITMENT TRAINING** (KCSiE 2018 para 84 Part Three and NCC HR Schools Portal)

The School Staffing (England) Regulations 2009, Part One, paragraph 9 states that with effect from 1 January 2010 the governing body must ensure that at least one person on any appointment panel has undertaken safe recruitment training.

- Face to face courses are provided by the Lucy Faithfull Foundation. The Lucy Faithfull Foundation has advised that there will be only a handful of courses during the year and it is suggested that a trainer is hired for the day (approx. £800) which is shared with other schools.

- On-line NSPCC safer recruitment training at the time of writing is at a cost of £30, and the anticipated time to complete the course is four hours.

- The NSCB has an online safer recruitment course but NCC HR have reviewed this and advised it is only suitable for refresher training.

Schools should continue to access safer recruitment training through either the Lucy Faithful Foundations or NSPCC, online courses, which are far more robust in standing up to scrutiny.

**Q16 & Q17 MANAGING ALLEGATIONS** (KCSiE 2018 Part Four and NCC HR Schools Portal)

There is a duty to fully investigate allegations and concerns about members of staff or volunteers. There must be procedures in place to do this which comply with KCSiE 2018 and also the NSCB procedures. The NSCB criteria are slightly different to the DfE guidance which recognises that personal concerns about those who work with children should be responded to. The NSCB procedures make it more explicit that concerns about a person’s private life can have implications for their work life, for example if they download indecent images of children at home, or there is domestic violence, or if their own children become subject to child protection concerns.

The procedures need to take into account the scenario where allegations are made against the head teacher (KCSiE 2018 para 31,152 & Part Four). The Chair of Governors would generally be the lead governor if this arose, and they would link with the local authority. All allegations should be discussed with the Local Authority Designated Officer (LADO) on the day the allegation is made known to the school, and advice sought from both LADO and HR Services.
Q18. CHILDREN MISSING FROM EDUCATION (KCSiE para 57, Annex A page 76)
KCSiE 2018 has reinforced the need for schools, academies and colleges to have at least two telephone contact numbers available for responsible adults. All staff should be aware of and follow the procedure relating to children missing from education, and children missing from home or care. All staff should know how to contact the NCC Children Missing Officer to report concerns, and know they are able to report concerns independently from the DSL. However, the DSL should be informed at the earliest opportunity. Children missing education, home and care can be at significant risk of harm and or abuse.

The Local Authority produces an annual flow chart in the autumn term which highlights the areas of work which ‘missing from education’ encompasses, as well as contact details. The link to this guidance is available here: Guidance for head teachers and business managers where children are at risk of missing education.
Alternatively, contact glen.scruby@nottscc.gov.uk.

Q19 NEW 2018/19 CHILD ON CHILD SEXUAL VIOLENCE AND SEXUAL HARRASSMENT (KCSiE para 43 Part Five and Annex A page 83)
The DFE has published detailed advice to support schools and colleges have a clearer awareness and understanding of the impact of sexual violence and sexual harassment on children and young people. It provides guidance on how to address incidents, concerns and how to support the children involved. Reference to child on child sexual violence and sexual harassment should be included in the school’s child protection policy. The statutory guidance advises that DSLs should take the lead role within the school in this area, and work closely with other agencies. This guidance is extensive and training should be accessed to support the DSL’s understanding.

Further advice can be accessed through the DFE online resources and from the NSCB.

Q20 CHILD PROTECTION AND CONFIDENTIAL FILE AUDIT (KCSiE 2018 para 36, 37, 209 243, Annex A page 91 and act in accordance with the school Child Protection Policy) By completing the Child Protection and Confidential File audit, the Named Governor for child protection/safeguarding confirms that the school maintains appropriate record keeping in relation to vulnerable children (child subject to child protection or child in need concerns and those who have Looked-After status). Guidance and audit tools are available on the safeguarding site of the Schools Portal and the NSCB website in the section Resources, Schools.

The audit can be undertaken by the Head, Deputy Head, Snr Designated Safeguarding Lead or Deputy Designated Safeguarding Lead with the lead governor for safeguarding, or any combination of these people. It is not necessary for the Governor to read through all the documents and confidential records, but to check that the school has in place appropriate recording practices and processes to keep children safe. The aim of such an audit is to learn how effective the school’s record keeping is in relation to children of concern. Lessons from the audit can then be fed back to all staff to improve future practice.

NCC advice is to continue to complete this audit annually to demonstrate and evidence good quality safeguarding arrangements are in place to maintain pupil records, especially in relation to child protection/confidential files. The audit can still be used by those schools, academies and college that use electronic recording systems, such as CPoms but will need to be adapted to reflect the electronic management of the files.

The auditing of individual children’s Child Protection and Child in Need files should evidence: the child and family’s story; the journey they have taken through safeguarding procedures; the support and interventions they have received with agencies and staff in school; and what actions have been taken over a period of time to support the and keep them safe.

The Child Protection and Confidential File audit tool reflects current safeguarding guidance
Concerns about information sharing is essential for the early identification of need, assessment and service provision.


- HM Working Together to Safeguard Children July 2018 page18,
- HM Information Sharing- advice for practitioners providing safeguarding services to children, young people, parents and carers,
- DfE Keeping Children Safe in Education September 2018

All staff, especially the DSLs, should be fully conversant with Information sharing protocols and the requirement to protect children and to keep them safe.

Q23 SPECIFIC SAFEGUARDING ISSUES KCSiE Para 89, 80 Part Five Annex A pages 76 to 86)

This question continues to highlight to governors that there are specific safeguarding issues which governors and the school need to be aware of, and that they have the processes in place to respond to.

All staff should have an awareness of these specific safeguarding issues, including that
behaviors linked to drug taking, alcohol abuse, truanting and sexting put children in danger. All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including on-line), gender based violence/sexual assaults and sexting. Staff should be clear as to the school or college’s policy and procedures with regards to peer on peer abuse.

DSLs should access additional training to ensure that they know how to respond to specific safeguarding concerns, how to provide support to others, and be able to take appropriate actions in accordance with statutory guidance to keep children safe.

Q24 OPPORTUNITIES TO TEACH SAFEGUARDING (KCSiE Para 80, 81, 82)
This question emphasizes the responsibility of schools, academies and colleges to be a key part of teaching children, in an age appropriate way, about specific safeguarding issues, including risks of child sexual exploitation.

The NSPCC provides the Child-Line Programme free of charge for all Nottinghamshire Primary Schools.

Changes to guidance on Sex and Relationship Education are in the process of being made, with pilots due to take place around September 2019.

Additional support and resources are available from the Tackling Emerging Threats to Children (TETC) Team, who are based at Meadow House, Mansfield.

Q25 ONLINE SAFETY (KCSiE 2018 Para 79 and Annex C)
This question relates to safeguarding children from potentially harmful and inappropriate material when working online. Governing bodies should ensure appropriate filters and appropriate monitoring systems are in place. Additional information to support governing bodies is provided in Annex C. However, schools should be careful not to over-block (Para 69) by putting unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Q26 FEMALE GENITAL MUTILATION (FGM) (KCSiE para 35)
FGM is illegal under the FGM Act 2003 and is a form of child abuse. Section 5B of the 2003 Act (as inserted by Section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for Teachers to report ‘known’ cases of FGM from 31 October 2015 directly to the police.

In such cases there should be discussion with the designated safeguarding lead, and a referral to the MASH, in line with usual safeguarding practice. Failure to report known cases to the police will lead to employee disciplinary processes and regulatory body scrutiny. Procedural information can be found here: Mandatory reporting of FGM procedural information

Q27 RADICALISATION (KCSiE Para 41 to 43 & Annex A)
Schools are subject to the ‘Prevent Duty’ under the Counter Terrorism & Security Act 2015. Schools must have due regard to the need to prevent people from being drawn into terrorism. Paragraphs 57-76 of the Revised Prevent duty guidance are specifically concerned with schools. There is separate guidance for colleges Prevent duty guidance for further education institutions.

Essentially, the guidance for schools confirms the need to ensure that the Prevent Duty is incorporated into existing safeguarding policies, and advises against standalone policies. It is not intended to be burdensome and builds on existing responsibilities.

Schools are expected to assess the risk of children being drawn into terrorism. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. Schools, academies and colleges should ensure their safeguarding arrangements takes into account the policies and
Schools should ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Where schools are concerned about individual children, there is a referral pathway for all agencies. School staff should understand when it is appropriate to make a referral to the Channel programme.

Q28 NEW 2018/19 HOLDING MORE THAN ONE EMERGENCY CONTACT NUMBER (KCSiE para 57) NCC Children Missing Guidance, NCC Annual Child Protection and Confidential File Audit

Having more than one emergency contact number for each pupil or student goes beyond the legal minimum and is good practice. For a school, academy or college to be able to contact a child's parent/ carer, family member or confirmed responsible adult in an emergency is something which is essential for all involved, and is especially important when time is limited; it may be crucial in situations where a child is missing, or maybe at risk of harm or abuse.