

## **Guidance for Headteachers: Safeguarding – COVID 19 annex / addendum to PDET policy and procedures**

**26/03/2020**

### **COVID-19 annex/addendum to PDET Policy and Procedures on Safeguarding/Child Protection**

**During the period in which COVID 19 measures are in place, PDET's Policy and Procedures on Safeguarding/Child Protection ('Safeguarding Policy') will continue to apply, but as varied and/or in line with the guidance/recommendations below:**

#### **Safeguarding and clusters**

Where schools/academies are collaborating and children and/or staff from multiple settings are clustered in one place, the principles in [Keeping children safe in education \(KCSIE\)](#) and the DfE guidance continue to apply. In particular, the school/academy that is acting as the hub in the cluster should continue to provide a safe environment, keep children safe and ensure staff and volunteers have been appropriately checked and risk assessments carried out as required. Additional advice on clusters and safeguarding will be provided by the DfE in due course.

#### **Keeping children safe in schools/academies**

KCSIE is statutory safeguarding guidance that schools/academies should continue to have regard to as per their legislative duty and/or funding agreement requirements.

Whilst acknowledging the pressure that schools/academies are under, it remains essential that as far as possible they continue to be safe places for children.

#### **A number of important safeguarding principles remain the same:**

- **with regard to safeguarding, the best interests of children must always continue to come first**
- **if anyone in a school/academy has a safeguarding concern about any child they should continue to act and act immediately as per this Safeguarding Policy (see - *Appendix A3 and Appendix C*). If they are unsure what to do, they should contact the PDET Central Team**
- **a DSL or deputy should be available – see below re: DSLs/DDSLs**
- **it is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children**

## Designated safeguarding leads (DSLs)

The optimal scenario for any school/academy providing care for children is to have a trained DSL or deputy available on site. It is recognised this may not be possible, and where this is the case there are 2 options to consider:

- a trained DSL or deputy from the school/academy can be available to be contacted via phone or online video - for example working from home
- sharing trained DSLs or deputies with other schools/academies (who should be available to be contacted via phone or online video)

Where a trained DSL or deputy is not on site, in addition to one of the above options, a senior leader takes responsibility for coordinating safeguarding on site. This might include updating and managing access to child protection files, liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school/academy.

Whatever the scenario, it is important that all school/academy staff and volunteers have access to a trained DSL or deputy and know on any given day who that person is and how to speak to them.

It is acknowledged that DSL training is very unlikely to take place during this period (although the option of online training can be explored). For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

Every school/academy will face unique challenges at this time. Where reasonably possible, the DSL (or deputy) should consider these in a child protection context.

## Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans, read more in the [guidance on vulnerable children and young people](#) for further information.

Local authorities have the key day-to-day responsibility for delivery of children's social care. Social workers and VSHs will continue to work with vulnerable children in this difficult period and should support these children to access this provision. There is an expectation that children with a social worker will attend provision, unless in consultation with the child's social worker and family it is agreed this is not in the best interests of the child.

Senior leaders, especially DSLs (and deputies) know who their most vulnerable children are and have the flexibility to offer a place to those on the edges of receiving children's social care support.

School/academy staff should continue to work with and support children's social workers to help protect vulnerable children. This will be especially important during the COVID-19 period.

## Attendance

Schools/academes do not need to complete their usual day-to-day attendance processes to follow up on non-attendance. Schools/academies and social workers should be agreeing with families whether children in need should be attending education provision – and the school/academy should then follow up on any child that they were expecting to attend, who does not. Schools/academies should also follow up with any parent or carer who has arranged care for their children and the children subsequently do not attend. To support the above, schools/academies should take the opportunity when communicating with parents and carers to confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available. **In all circumstances where a vulnerable child does not take up their place at school/academy, or discontinues, the school/academy should notify their social worker.**

The DfE has introduced a [daily online attendance form](#) to keep a record of children of critical workers and vulnerable children who are attending school/academy. This allows for a record of attendance for safeguarding purposes and allows schools/academies to provide accurate, up-to-date data to the department on the number of children taking up places.

## Staff training and safeguarding induction

All existing school/academy staff will already have had safeguarding training and have read part 1 of KCSIE. The important thing for these staff will be awareness of any new local arrangements so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter the school/academy, they should continue to be provided with a safeguarding induction as per this Safeguarding Policy.

**The existing school/academy workforce may move between schools/academies on a temporary basis in response to COVID-19. The receiving school or college should judge, on a case-by-case basis, the level of safeguarding induction required. In most cases, the existing workforce will already have received appropriate safeguarding training and all they will require (if not a PDET school/academy) is a copy of the this Safeguarding Policy and in all cases, confirmation of local processes and of DSL arrangements.**

## Children moving schools and colleges

It will be important for any school/academy whose children are attending another setting to do whatever they reasonably can to provide the receiving institution with any relevant welfare and child protection information. This will be especially important where children are vulnerable. For looked-after children, any change in school/academy should be led and managed by the VSH with responsibility for the child. The receiving institution should be aware of the reason the child is vulnerable

and any arrangements in place to support them. As a minimum the receiving institution should, as appropriate, have access to a vulnerable child's EHC plan, child in need plan, child protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH is). This should ideally happen before a child arrives and, where that is not possible as soon as reasonably practicable. Any exchanges of information will ideally happen at DSL (or deputy) level, and likewise between special educational needs coordinators/named individual with oversight of SEN provision for children with EHC plans. However, it is acknowledged this may not always be possible. Where this is the case senior leaders should take responsibility.

Whilst schools/academies must continue to have appropriate regard to data protection and GDPR they do not prevent the sharing of information for the purposes of keeping children safe. Further advice about information sharing can be found at paragraphs 76-83 of KCSIE.

### **Safer recruitment/volunteers and movement of staff (including DBS arrangements)**

**It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children.** If schools/academies are recruiting new staff, they should continue to follow the relevant safer recruitment processes as set out in this Safeguarding Policy, including, as appropriate, relevant sections in part 3 of KCSIE. In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its [guidance on standard and enhanced DBS ID checking](#) to minimise the need for face-to-face contact.

Where schools/academies are utilising volunteers, they should continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. **Under no circumstances should a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.**

Regarding members of the school/academy workforce already engaging in regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another school/academy to support the care of children. The type of setting on the DBS check, for example a specific category of school, is not a barrier. The same principle applies if childcare workers move to work temporarily in a school setting. The receiving institution should risk assess as they would for a volunteer (see above). Whilst the onus remains on schools/academies to satisfy themselves that someone in their setting has had the required checks, including as required those set out in part 3 of KCSIE, in the above scenario this can be achieved, if the receiving institution chooses to, via seeking assurance from the current employer rather than requiring new checks.

Schools/academies must continue to follow their legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph 163 of KCSIE.

Schools/academies should continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's '[Teacher misconduct advice for making a referral](#)'. During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk). All referrals received by the TRA will continue to be considered. Where referrals on serious safeguarding matters are received and it is deemed that there is a public interest in doing so consideration will be given as to whether an interim prohibition order (IPO) should be put in place. The TRA will continue to progress all cases but will not schedule any hearings at the current time.

Whilst acknowledging the challenge of the current environment, **it is essential from a safeguarding perspective that any school/academy is aware, on any given day, which staff/volunteers will be in the school/academy, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity.** As such, **schools/academies must continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.** The SCR can, if a school/academy chooses, provide the means to log everyone that will be working or volunteering in a school/academy on any given day, including any staff who may be on loan from other institutions. The SCR can also, if a school/academy chooses, be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

## **Mental health**

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers should be aware of this in setting expectations of pupils' work where they are at home. The DfE is providing separate guidance on providing education remotely.

Where they are providing for children of critical workers and vulnerable children on site, schools/academies should ensure appropriate support is in place for them. The DfE's guidance on mental health and behaviour in schools sets out how mental health issues can bring about changes in a young person's behaviour or emotional state which can be displayed in a range of different ways, and that can be an indication of an underlying problem. Support for pupils in the current circumstances can include existing provision in the school/academy (although this may be delivered in different ways, for example over the phone) or from specialist staff or support services. You can read the guidance on [mental health and behaviour in schools](#).

## **Online safety in schools/academies**

**It will be more important than ever that schools/academies provide a safe environment, including online.** Schools/academies should continue to ensure that appropriate filters and monitoring systems (read [guidance on what "appropriate" looks like](#)) are in place to protect children when they are online on the school's/academy's IT systems or recommended resources. Schools/academies should consider who in their institution has the technical knowledge to maintain safe IT arrangements. Schools/academies should also consider what their contingency arrangements are if their IT staff become unavailable.

The [UK Council for Internet Safety provides information to help governing boards and proprietors assure themselves](#) that any new arrangements continue to effectively safeguard children online.

The [UK Safer Internet Centre's professional online safety helpline](#) also provides support for the children's workforce with any online safety issues they face. Local authorities may also be able to provide support.

## Children and online safety away from school/academy

**All schools/academies should be doing what they reasonably can to keep all of their children safe.** In most cases, the majority of children will not be physically attending the school/academy. **It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per this Safeguarding Policy and where appropriate referrals should still be made to children's social care and as required the police.**

The DfE is providing separate guidance on providing education remotely. It will set out 4 key areas that leaders should consider as part of any remote learning strategy. This includes the use of technology. Recently published [guidance from the UK Safer Internet Centre on safe remote learning](#) and from the [London Grid for Learning on the use of videos and livestreaming](#) could help plan online lessons and/or activities and plan them safely.

All schools/academies should consider the safety of their children when they are asked to work online. The starting point for online teaching should be that the same principles as set out in PDET's Staff Code of Conduct and Acceptable Use Policy apply. The policy should apply equally to any existing or new online and distance learning arrangements which are introduced. Schools/academies should, as much as is reasonably possible, consider if their existing policies adequately reflect the new reality of so many children (and in some cases staff) working remotely online. The principles set out in the [guidance for safer working practice for those working with children and young people in education settings published by the Safer Recruitment Consortium](#) may help schools/academies satisfy themselves that their policies and practices are robust and effective.

Schools/academies should ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to the school/academy this should also signpost children to age appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

Schools/academies are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school/academy (if anyone) their child is going to be interacting with online.

Parents and carers may choose to supplement the school/academy online offer with support from online companies and in some cases individual tutors. In their communications with parents and carers, schools/academies should emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children. Support for parents and carers to keep their children safe online includes:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and carers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

This support should be shared with parents and carers.

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