Keeping Children Safe in Education 2022

**Implementation tool & report to SLT/Governors**

This implementation tool is designed for settings to use alongside the guidance Keeping Children Safe in Education 2022 to support making changes to practice to achieve compliance.

This document is aimed to be used by your setting as a template – there may be additional areas you wish to include specific to your setting and you can amend this tool accordingly. We suggest that this provides a strategic base for reviewing practice in line with the guidance and also provides an oversight tool for governors and trustees to monitor changes.

Where there is further information in the notes section, this is intentioned as information only and you may want to delete this out and use this section to record your own setting’s progress, actions and evidence.

| **Item** | **KCSiE para** | **Requirement** | **Date/Who** | **Notes/evidence of completion** |
| --- | --- | --- | --- | --- |
| **Reading Keeping Children Safe in Education** |
|  | Page 5 | Ensure all staff read **and understands their responsibilities** inthe relevant sections of the guidance (with thanks to [Carolyn Eyre](https://carolyneyre.com/), safeguarding consultant, for devising the guide below): | 01/09/22DSL | Our [KCSiE Knowledge Check](https://safeguarding.network/dsl-control-panel/) will track this for you. |
|  |  | * **Some staff** may read only Annex A if assessed appropriate by governors as in the best interests of children
* **Everyone else** - should read & understand their responsibilities as described in part 1
* **All staff with direct contact** with children should read annex B.
* **HTs / Principals and DSLs** should read the whole thing (DSLs should ensure annex C is included in their job description).
* **HTs / SLT/ Designated staff and behaviour leads** should read part 5.
* **Proprietors** should read part 2, part 3 especially paras 318-325, part 4 & 5.
* **Governors** should read part 2 as a minimum but be aware they’re responsible for compliance in Parts 3, 4 & 5.
* **Designated governor** should read the whole of the guidance.
* Anyone involved in **recruitment and / or SCR** (including recruiters / managers of volunteers) should read part 3 and annex E
* Anyone involved in **MFL / other school exchanges** should read part 3 paras 334-339, and annex D.
* **HR people** should read it all but concentrate on parts 3 & 4, and annex E.
* **WRL coordinators** should read part 3 paras 328-333, and annex E.
 |
| **Policy updates** |
| 1. | About the guidance, 10, 13, 19, 24, 26 | Update Safeguarding Policy with the following changes:* Replace terminology **peer-on-peer** abuse with **child-on-child** abuse in all relevant policies.
* Replace terminology Children’s Social Care with Local Authority Children’s Social Care
* Update definition of abuse in policy to include the following statement: *‘Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.’*
* Include paragraph regarding children disclosing abuse: *“All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.’*
* Ensure that references to the advice document Sexual Violence and Sexual Harassment Between Children are removed.
* Ensure consistency of language when considering children and young people who may have been harmed (KCSiE refers to them as victims) and those who may have harmed (KCSiE refers to this cohort as perpetrators).
 | 01/09/22Governing Body / DSL / Proprietors |  |
| 2. | 23, 26, 43 | Update safeguarding policy and any specific domestic abuse policy with definitions of Domestic Abuse from Domestic Abuse Act 2021, specifically that children can be victims of domestic abuse themselves | 01/09/22Governing Body / DSL / Proprietors | New definition: *“Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.”* |
| 3. | 24, 140 | Update Online Safety Policy to include:* Reference to misogynist and misandrist concerns
* Reference to the fact that concerns can occur both online and offline simultaneously
* Reference about the setting’s monitoring and filtering systems and procedures for identifying and escalating concerns arising as a result of these systems
 | 01/09/22Governing Body / DSL / Proprietors |  |
| 4. | 13, 71-73, 380, 399, 425, 432-435. | Update Managing Allegations Policy to include:* Terminology emphasised to be used consistently – concern or allegation. Policy needs to be clear about what a low-level concern is (e.g. staff taking photographs of children on their mobile phone without prior agreement) and the procedure for reporting low level concerns.
* Ensure the broader definition of concerning behaviour as “humiliating pupils” is included in policy.
* Review reference to when suspension might be used.
* Include paragraph of learning lessons from cases: *“For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should* *consider the facts and determine whether any lessons can be learned and if improvements can be made.”*
* Review of whole policy to ensure that it is clear, easy to understand and implement.
 | 01/09/22Governing Body / DSL / Proprietors |  |
| 5. | 13 | Review Staff Behaviour Policy/Code to Conduct. The policy should include, amongst other things: * the process for reporting low-level concerns
* allegations against staff
* whistleblowing
* acceptable use of technologies (including the use of mobile devices)
* staff/pupil relationships and communications including the use of social media.
 | 01/09/22Governing Body / DSL / Proprietors | The Safer Recruitment Consortium have updated [Guidance for Safer Working Practice](https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital). The updated document was published in February 2022 and will provide an excellent base to consider your Staff Code of Conduct.  |
| 6. | 96 | Ensure Safeguarding Policy and other relevant policies are clear and understandable, available and accessible to all stakeholders. | 01/09/22Governing Body / DSL / Proprietors | We recommend that settings have parent/student friendly versions of relevant policies and consider demographic of school population in order to ensure accessibility, e.g. English as an Additional Language and SEND. |
| **Safeguarding training** |
| 7. | 13, 18, 19, 21, 23, 24, 31, 68, 118, 202-204, Annex B | Review safeguarding training to ensure that:* all staff are aware that children may not be ready to disclose abuse and may not know they are experiencing abuse/neglect.
* early identification through sharing concerns with the DSL is vital.
* staff are alert to all forms of abuse and neglect, both with the family and outside of the family (extra-familial harm)
* covers serious violence and includes new indicators of concern for serious violence as found in annex B
* staff are aware of the role that technology plays in the abuse of children, and that risks can present “concurrently both online and offline”, along with the harm that comments can cause (e.g. misogynist and misandrist comments).
* change in terminology from peer-on-peer to child-on-child abuse and explains that previous guidance on SVSH is now statutory in KCSiE 22 and the concept that children can abuse other children.
* includes explanation of professional curiosity
* staff are confident to reassure victims that they are being taken seriously and will be kept safe.
* reminded that data protection is not a barrier to sharing information and there are occasions where this can be shared without consent.
* are aware of the need to record information and the rationale for this (including dealing with complaints further down the line where raised).
* additional risks faced by children and young people who identify as or are perceived to be members of the LGBTQ+ community are covered, along with the importance of there being a trusted adult.
 | 01/09/22DSL | We recommend that DSLs ensure staff fully understand the reasons behind some of the changes. Whilst these may only appear to be minor in most cases, there are nuanced reasons for the changes which support staff’s awareness and attitudes towards safeguarding. For example, the change form peer-on-peer abuse to child-on-child highlights that abuse can happen between children of any ages, not necessarily within a peer group.For face to face/online annual refresher training for your setting, please [contact us](https://safeguarding.network/content/contact/) to arrange.  |
| 8. | 14, 124 | Ensure staff training is delivered regularly to *“continue to provide them (staff) with relevant skills and knowledge to safeguard children effectively’”*. | OngoingDSL | Your setting already meets this requirement if you use the training materials each month in staff meetings.Safeguarding Network have devised all materials to be delivered in a regular, bitesize way to ensure staff are up to date on all key safeguarding topics. Remember, our ready-made resources can be delivered by any member of staff and allocating different staff members this responsibility can support with embedding the concept of ‘**safeguarding is everyone’s responsibility’.**  |
| 9. | 81 | Ensure all governors have safeguarding training (including online risks) and that any future Governors receive this training at point of induction.  | OngoingDSL / Governing Body / Trustees | You should ensure you have planned, delivered and evidenced the impact of safeguarding training for governors.If required, Safeguarding Network can deliver Safeguarding Training for Governors for your setting. Please [contact us](https://safeguarding.network/content/contact/) to arrange.The emphasis on strategic management is highlighted in the guidance. Safeguarding Network are offering a free term of Safeguarding Governor Membership trial to support with this.  |
| 10. | 82-93 | Ensure governors are aware of the requirements placed on them by the Human Rights Act 1998, the Equality Act 2010 (which includes the Public Sector Equality Duty) and what these mean in practice. | 01/09/22 Governing Body | Ensure governors have read paragraphs 82-93 of the guidance and agenda an item to consider any issues arising. |
| **Governance** |
| 11. | 102 | **Sole proprietor settings only:**The DSL **cannot** be the proprietor. | 01/09/22Proprietor / Trustees |  |
| 12. | 103-105 | The Governing Body should evidence that they have both read these paragraphs and Annex C in full ensuring they have a full understanding of the role of the DSL. There should also be discussion to ensure the DSL has the time, status and authority to carry out the role in school.  | 01/09/22Governing Body / Trustees | This is an area which can be difficult to address. Many DSLs find time and workload a challenge. We can support with this through our external supervision service.  |
| 13. | 121 | Review information sharing processes around transition: Ensure DSLs and DDSLs are aware of the 5-day window in which a child protection file should be shared with the receiving setting.  | 01/09/22DSL | Problems with information sharing is repeatedly highlighted as a barrier to effective safeguarding. We recommend this is built into admissions/transition process/policy.  |
| 14. | 136 | Review of online safety by governing body to ensure:* online safety is a ‘running and interrelated theme’ in the whole setting approach to safeguarding.
* appropriate filters and monitoring systems are in place.
 | Autumn termDSL / Governing Body |  |
| 15. | 151 | Governors need to satisfy themselves that there are adequate procedures in place for the reporting and following-up of low-level concerns. | 01/09/22Governing Body |  |
| 16. | 166 | Review safeguarding arrangements for use of premises out of school settings. Proprietors and governors must ensure effective arrangements are in place regardless of whether or not the children are on roll in your setting or not. | 01/09/22Governing Body / DSL / Proprietors |  |
| 17. | 420 | Ensure that there is a process by which any learning can be identified from cases where allegations have been found to be either, unfounded, false, malicious or unsubstantiated can be identified and lead to improvements. | 01/09/22Governing Body / DSL |  |
| **Curriculum / whole school approach** |
| 18 | 128-133 | Review Safeguarding Curriculum to ensure a joined-up approach between curriculum, values/ethos of school, relevant policies and pastoral systems with the following areas included:* healthy and respectful relationships
* boundaries and consent
* stereotyping, prejudice and equality
* body confidence and self-esteem
* how to recognise an abusive relationship, including coercive and controlling behaviour
* the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support
* what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Ensure inclusivity in safeguarding curriculum, specifically considering LGBT children or those perceived to be. We recommend that settings review the curriculum in consultation of its efficacy with all stakeholders, including parents/carers and children/young people.  | End of autumn term 2022DSL / SLT | Curriculum is an area covered in the Culture and Leadership part of our enhanced membership review process. Upgrade your membership by [contacting us](https://safeguarding.network/content/contact/) for support in this area.  |
| 19. | 138-139 | Work with parents to reinforce the importance of online safety and ensuring parents aware of what sites children and young people are being asked to visit if they are undertaking remote education. | OngoingDSL/SLT |  |
| 20. | 24, 140, 141, 198, 560, 561 | Review filtering and monitoring systems:* are filtering systems effective?
* how does your filtering system score on the SWGfL tool?
* are concerns identified?
* are concerns escalated?
* how are children with additional barriers (e.g. SEND) supported?
 | OngoingDSL / SLT / Governing body | We have an online safety e-learning module produced by the Marie Collins Foundation in our members area for a discounted price for members.  |
| 21. | 174 | Work with staff who monitor attendance to ensure that where there are issues around non-attendance and specifically persistent non-attendance, these are flagged with the safeguarding team to consider whether there are safeguarding issues such as risk of criminal exploitation. | 01/09/22 - ongoingDSL / Attendance staff |  |
| 22. | 301 | Ensure staff responsible for checking the ID and appropriateness of professional visitors are aware that if there has been an assurance from the professional’s employing agency that due diligence has been completed, they should not ask to see the DBS certificate. | 01/09/22DSL / Office staff |  |
| **Safer Recruitment** |
| 23. | 214 | Ensure Safer Recruitment Practice includes full application form, and that where CV’s are submitted there is a full application form also completed.  | OngoingDSL / SLT / Governing body |  |
| 24. | 220 | Review recruitment procedures and consider including ‘online searches’ as part of due diligence. We recommend you clearly set out in your procedures:1. Who will complete the checks?
2. What sort of information would be raised and discussed with an applicant?
3. What platforms will be used to conduct searches?

Any information used in this process must be publicly available. | OngoingDSL / SLT / Governing body |  |
| 25. | 223 | Ensure staff who review references obtained as part of the recruitment process or who provide references are aware of the change of language from “substantiated safeguarding allegations” to “concerns/allegations that meet the harm threshold”. | OngoingDSL / Office and business staff / SLT |  |
| 26. | 234, 278, 325 | Ensure staff who are involved in undertaking checks as part of the recruitment process of staff, governors and volunteers are aware of the changes in wording to the identified paragraphs. The changes clarify previous positions and relate specifically to:* consideration of when enhanced DBS checks should be requested even if there is no formal requirement to complete an enhanced DBS check.
* checks which are to be completed when an individual has worked or lived outside the UK.
* DBS checks on individuals or members of committees to whom an academy trust has delegated responsibilities must now be at an enhanced level.
 | DSL / SLT / Office and business staff |  |
| **Child on child sexual violence and sexual harassment** |
| 27. | Part Five | This section has incorporated the separate advice document “Sexual Violence and Sexual Harassment Between Children”. This addition to the guidance makes the measures statutory. In line with this addition, you will need to make sure you review your practice in line with a strong safeguarding culture.Our 5-point plan provides a starting point for this:1. Ensure there is an up-to-date policy covering Sexual Violence and Sexual Harassment Between, including being mentioned in other relevant policies, e.g. Safeguarding and Behaviour. Are these known and understood by all stakeholders?
2. Review staff training – how confident are staff in identifying, responding to and reporting concerns?
3. Review recording systems. Are all incidents appropriately recorded with analysis and actions included? Are patterns identified?
4. Review curriculum. Is it inclusive of LGBT? Have you sought the opinions of key stakeholders on this?
5. Review strategic oversight. Are governors/trustees trained and involved in action planning in this area?
 | 01/09/22DSL / SLT | It will be helpful for you to consider the actions you took last year following on from Ofsted’s review into sexual violence and sexual harassment between children in schools and colleges, the impact and your evidence for this. This is a good base for you to begin to build on now the guidance has been included in KCSiE 22.We provide a separate audit tool for settings to use specifically to review measures for Sexual Violence and Harassment Between Children. Our Governor trial membership also provides support for Governors to complete a learning walk with this focus.  |
| **Annex C – Role of the Designated Safeguarding Lead** |
| 28. | Working with others | Ensure all DSLs and DDSLs have an understanding of the role of an appropriate adult – PACE Code C 2019. In addition to the requirement in KCSiE 2022 regarding role of the Appropriate Adult, we would advise that all DSLs and DDSLs are comfortable with making professional challenge and understand the UN Convention on the Rights of the Child and ensure the definition of a child – anyone under 18 – is recognised fully by all staff.  | 01/09/22DSL / Governing body / Proprietors | This addition is in response to the Child Q case review. DSLs are reminded that all policies and practices should be set out in the best interests of the children attending the setting. |
| **Boarding schools, residential special schools, residential colleges and children’s homes** |
| 29. | 158 | Ensure that staff are trained and appreciate the additional vulnerabilities that children with SEND in such settings may face. | OngoingDSL |  |