School Safeguarding Audit 2020/2021

1. Purpose of this report

1.1. The purpose of this report is to feed back to North Yorkshire schools the key themes identified from the North Yorkshire Safeguarding Children Partnership's (NYSCP's) School Safeguarding Audit 2020/2021 across the different types of educational settings and phases of education up to the age of 18.

2. Response to the Audit

2.1. The School Safeguarding Audit conducted in 2018/2019 achieved an overall response rate of 98.7% across all schools, with 100% responses only being received by Secondary and independent schools. The response rate for the 2020/2021 audit has increased to 99.7%. The improvement in responses has been as a result of the NYSCP and NYCC Education and Skills working together to secure a greater response rate. The improved response rate has shown great deal of dedication to the audit across all schools despite the impact of the ongoing pandemic and the additional work undertaken across schools to continue children's education throughout lockdowns.

3. Audit themes

3.1. The school safeguarding audit was separated into 8 key themed areas, these were:

- Section 1 – Safer Recruitment
- Section 2 – Management of Safeguarding
- Section 3 - Inclusion
- Section 4 – Managing Risk
- Section 5 – Early Years
- Section 6 – Learning Beyond the Classroom
- Section 7 - Premises Security, and
- Section 8 - Premises H&S

3.2. Overall, schools mostly reported that requirements identified in the audit were in place across all types of educational establishments and phases of education. It is important to note that while the standards identified in the audit link to Keeping Children Safe in Education (2020), Working Together to Safeguard Children (2018), Health and Safety and other legislative and statutory guidance, not all requirements are applicable to every school, for example, requirements for early years are not applicable to all settings, generally only secondary school offer work experience for students, not all schools have shared premises or rent out school classrooms on an evening and there are some differences in requirements for different educational setting. However, in the main, the majority of requirements are shared across all establishments and phases of education.

4. Section 1 – Safer recruitment

4.1. In most schools there are good arrangements in place for safer recruitment checks across all phases and school types (i.e. maintained, independent/free/special/academies/independent). However, while schools reported a high degree of safer recruitment practice in place, primary schools did not achieve 100% compliance in any areas and total compliance was only achieved in a few areas across secondary schools, special schools, and Pupil Referral Services (PRS) and Independent schools.

4.2. Themes identified for consideration included:

- Ensuring at least one member of appointment panels has safer recruitment training.
- Inclusion of members of the proprietor body being on the Single Central Record (SCR) for Academies and independent schools.
- Ensure that the SCR evidence all relevant checks and contain the correct information (maintained and academy primary and secondary schools).
- Evidencing checks made under the Education and Skills Act, Section 128 for academies and independent schools to reveal whether a person has been prohibited from being involved in the management of a school.
- Checks are made to ensure that agency/third-party staff have in place relevant checks (despite PRSs reporting 100% compliance, up to 10% of other school types reported this not being fully in place with between 3-10.5% saying it was not applicable). Linked to this there were also weaknesses identified with schools seeking evidence that freelance staff were appropriately checked.
- Despite the requirement for all staff to be aware that they must inform their employer of any police action against them during the course of their employment up to 13% of staff across primary and secondary phase maintained schools and academies reported less than 100% achievement for this requirement.
- Across most schools and academies, ensuring that appropriate checks for links with extremism, etc. were not fully in place, with maintained primary, special and independent schools reporting this in more than 10% of schools or that this was not applicable.

5. Section 2 – Management of Safeguarding

5.1. The management of safeguarding section is the most comprehensive element of the audit consisting of seventy safeguarding questions. The overall level of schools reporting arrangements being in place was high across all phases and types of schools. It was noted that in several requirements primary academies, secondary schools, special schools PRS's and independent schools reported 100% implementation. For primary, secondary schools and PRS there was planned activity ongoing in most areas. It was noted that special schools and independent schools had less activity as actions plans had already been implemented

5.2. The most common areas where schools reported arrangements not being in place were:

- Emergency planning was identified for some maintained primary schools and secondary schools and academies
- While the role of the Designated Safeguarding Lead (DSL) was recognised in most schools or schools were actively involved in promoting the role, there were a small number of schools that have not formalised the role of DSL in job descriptions. A relatively small number of both primary and secondary schools (less than 10%) indicated that there was no action plan to correct this. It was also noted that a small number of primary schools reported this was not applicable. Other issues identified in a small number of schools related to the DSL included giving the role time, funding, and training to undertake the role, as well as cover for the role.
- Most schools have in place arrangements to record that staff have read and agreed the staff behaviour policy including acceptable usage and social media on induction. It was concerning that a small number of primary schools reported that this was not applicable or had no plan to do this with some secondary academies stating they did not have a plan to address this and some not responding to the question. These policies and procedures are relative easy to develop and can be cascaded across schools within a short timeframe. As such all schools should have these in place.
- There were gaps in oversight of governance across different types of school and phases of education. This was evidenced in a number of questions which asked if governors had ensured requirements were in place, for example:
  - The teaching of safeguarding to include online safety which is part of the national curriculum
  - Being aware of local multi-agency arrangements for safeguarding
  - Ensuring staff understand about GDPR, data protection

- o Having robust procedures for managing emergency situations
- o Information sharing, and
- o Ensuring appropriate filtering and monitoring for inappropriate material.

- Awareness of safeguarding appears to be high in most schools. Some of secondary schools reported that they were implementing an agreed plan in this area even though they have had had access to a lot of training to support this.

- A small number of primary schools and independent schools reported that it was not applicable to retain records following a directive from the Independent Inquiry into Child Sex Abuse that records of child sex abuse should be retained for the period of the inquiry or was an unidentified risk.

- The majority of schools reported that the DSL knew which children had a social worker but a small number of of primary schools and of independent schools reported that this was not applicable. In addition some maintained secondary and independent schools did not use this information when making decisions on safeguarding. A small number of primary schools felt this was not applicable or did not answer the question. Other linked themes included:
    - o Taking the child's wishes and feelings into account
    - o Maintaining a list of referrals made to the DSL which were subsequently reported to the local authority
    - o Making sure staff have regular supervision when working with concerns about the safety and welfare of a child

- Requirements regarding Children in Care and the Virtual School were reported as not applicable or an unidentified risk for independent schools. 22% of maintained primary schools and some of primary academies reported that it was not applicable for their schools to work with the Virtual School Head.

6. Section 3 – Inclusion

6.1. The area of inclusion includes identifying patters of bullying and harassment, restorative approaches, reporting of incidents, school absence, etc. With the COVID-19 virus impacting on school every day life, there has been an increase in mental health issues and children studying at home. This has highlighted the need for schools to ensure appropriate health checks are completed on students as they could disappear from the oversight of professionals and exposed to hidden harm. All schools reported they have or are developing systems to monitor bullying and harassment.

6.2. The main themes identified were:

- Not all schools have in place systems to report and monitor hate crimes, etc. through the local authority system and no agreed action plans to do so, with a number of secondary schools and of independent schools reporting this as not being applicable.

- A number of schools do not report hate crimes to the police. Up to 14% of primary schools reported they were not compliant with this requirement, a small number of secondary academies reported this as an identified safeguarding concern with no agreed action plan and a small number of Independent Schools reported that this was not applicable.

- For maintained secondary schools:
    - o Less than 10% reported that they felt it was not applicable to ensure appropriate risk assessments and personalised education plans for children with complex needs which are reviewed each term
    - o Less than 10% reported it was not applicable for their school to monitor any use of restrictive physical intervention
    - o Less than 10% do not provide staff with appropriate guidance and support for the safe transition of pupils with complex and challenging needs

- Not all schools have in place systems to make sure all pupils (including those with SEND) know who they can talk to if they have concerns or if they wish to report specific incidents (e.g. bullying behaviour or harassment).

This is an area of development that is needed, although it is noted that North Yorkshire Education and Skills are planning on providing more support to schools in this area during the autumn term of 2021.

- With the impact of Covid-19 resulting in an increased number of children learning from home or being home educated it is vital that schools follow up on absences from lessons. While this was in place for nearly all primary schools, 16% of schools reported that they were undertaking an action plan in this area rather than having had arrangements in place, despite there has being three lockdown periods in the last 12 months.
- A number of schools reported not having a Designated Senior Lead for Mental Health to oversee a whole school. Some of Independent schools reported this as not being applicable, while some others reported this as being an unidentified risk, or reporting it as a risk without an agreed action plan. Linked to this, up to 30% of schools reported that did not have arrangements in place to seek attendance information whenever pupils are educated off site. While the opportunities for off-site education would be very limited because of the Coronavirus, it should also include children being educated at home given the current pandemic.
- It was noted in some primary schools that deregistering of students was not always reported to the local authority. Given the statutory requirements of deregistering a child from school due exclusion and the requirements on the local authority, and the increased number of children being deregistered due to elected home education, it is of concern that between up to 15% of primary schools and maintained secondary schools reported this as being not applicable and a small number of schools reporting that this is an unidentified risk or a risk without an action plan.
- It was noted that a small number of primary schools reported that in the event of needing to exclude a child, the child is always kept safe and is supervised on school premises until they have been collected by a parent/carer. This was also the case for some Independent Schools and special schools. It was not clear if some schools were responding as not applicable because they had not had to exclude a child; however, given the vulnerability of children who are excluded, this should be in place in all schools.

7. Section 4 – Managing Risk

7.1. This area examined issues regarding governing bodies making sure that children receive online safety training, ensuring staff have relevant Continuous Professional Development (CPD) to teach age appropriate aspects of safeguarding and that schools have Sex Education, Substance Misuse and Smoke Free policies.

7.2. It was noted that:

- A number of primary schools (up to 14%) and secondary schools (up to 26%) were developing arrangements to assure appropriate arrangements for governors to monitor safeguarding and internet safety being taught as part of the curriculum.
- Up to a third of schools reported implementing plans to improve their continued professional development to allow staff to deliver age appropriate safeguarding.
- Up to 36% of schools indicated plans being implemented to have up to date Relationships, Sex Education and Substance Misuse and Smoke Free policies for pupils with a few maintained secondary schools indicating no plan in was in place. This is of concern as Sex and Relationship Education is a statutory requirement for all schools.

7.3. It is noted that North Yorkshire Education and Skills has guidance for these issues and can provide support to help schools develop.

8. Section 5 – Early Years

8.1. Compliance with early year's requirements generally was good with schools reporting many arrangements in place or they were working to implement these. Key areas included:

- A number of primary schools were undertaking work to develop the policies and procedures outlined in the EYFS Statutory Framework.

- Policies for intimate care was undertaking active development in a number of primary schools; however, under 10% of primary schools stated this was not applicable.
- There was an apparent imbalance between the number of schools reporting that early year's foundation stage being relevant to their students and the number of schools who reported certain requirements as not applicable. This indicates potential confusion within schools as to how Early Years links to schools.

9. Section 6 – Learning Beyond the Classroom

9.1. The questions for learning beyond the classroom covered a range of subjects including policies and procedures, risk management and safeguarding arrangements. While schools reported having arrangements in place for most areas or at least were in the process of delivering improvement for learning beyond the classroom it was noted that:

- Up to 20% of secondary schools reported that it was not applicable that appropriate safeguarding arrangements for pupils undertaking work experience were applicable or did not answer the question. This may be because schools do not organise work experience for students; however, it was also interesting to note that between up to 48% of primary schools reported that these arrangements were in place.
- Over half of maintained primary schools and 40% of secondary schools either stated the provision of appropriate safeguarding arrangements for pupils in alternative provision was either not applicable or did not respond to the question. This was lower for maintained secondary schools whereas all academies reported that this was in place or there was an action plan being implemented to address this. Half of special schools and most of independent schools also did not respond to the question or stated it was not applicable
- Most schools have in place educational visits coordinators. A small number of primary schools secondary academies, special and independent schools reported this as a risk without an identified action plan.
- A few secondary academies reported an unaddressed risk of not recording evidence of staff's ability to lead educational visit/outdoor learning/adventurous activities. A small number of Special schools reported the same.
- It was also noted that a small number of schools did not answer multiple questions in this area which may be due to the current circumstances relating to Covid and restrictions on education visits and schools interpreting this as currently not relevant.

10. Section 7 – Premises Security

10.1. This section links to the security of school premises which includes issues such as management of visitors, pupil handover, management of bus arrangements and other risks in and around school including out of school hours. Responses showed that:

- Most schools identified that they had arrangements in place or were implementing action plans to make sure school sites and buildings were in place and measures take to identify the purpose of visitors in school; however, a small number of secondary schools and academies reported this as an identified risk without and agreed action. It was also noted that up to 11% of academies did not respond to this question
- While most school had in place arrangements for managing pedestrians with moving vehicles a small number of primary schools did stated that this was not applicable, with some secondary academies reporting that it was a known risk without an agreed plan to address. Similarly, measures were not in place for some schools regarding buses, coaches, minibuses and taxis with up to 14% of primary schools reporting this was not applicable and some of secondary academies reporting that it was a known risk but did not have an agreed plan to address this
- A small number of schools across phases of education and types of establishment reported that having arrangements in place for receiving and handing over pupils at the end of the day was not applicable or did not respond to the question

- Most schools had in place arrangements to reduce the risk of unauthorised persons outside of school hours; however, some secondary academies reported that this was a known risk without an agreed action plan to address.

11. Section 8 – Premises Health and Safety

11.1. Premises health and safety includes a number of issues such as whether the Health and Safety Policy which has been communicated to staff, evidence of health and safety reports and action plans, fire safety, legionella risk management, maintenance, medical and first aid procedures. The audit showed that generally schools had good arrangements in place. Based on responses:

- It was of concern that a small number of maintained primary and secondary schools reported that they did not have a health and safety policy despite this being a requirement as outlined in the Department for Education's Guidance on statutory policies for schools and academy trusts.
- A developmental area was for schools to ensure that the policy had been communicated to all staff and they had signed to say that they understood this
- While most schools had in place prioritised risk assessment programmes, this was an active area of development for a number of schools, with less than 10% of secondary academies reporting this was an area where they had no plan in place to address the requirement
- Most schools had in place adequate arrangements for maintenance of premises, although some of secondary academies reported this as an area which did not have an agreed plan to address.
- Most schools had in place medical policies and first aid procedures in place. A small number of primary schools did not respond to this question.

12. Comparison to Previous Audit

12.1. A School Safeguarding Audit was previously completed for 2018/2019. This audit identified the following key themes:

- General record keeping
- Managing emergency situations
- Children in Care
- E-Safety
- Relationships and Sex Education

12.2. It was disappointing to note that despite work which has been completed by the NYSCP and its partners, many issues present in the last audit continued into this.

12.3. Record keeping in relation to the SCR continues to have inconsistencies and some schools have or continue to report that they do not maintain a list of cases open to Local Authority services.

12.4. There appeared to be some improvement in schools managing emergency situations which at the time of the previous audit was more focused on counter terrorism and concerns in this area were not prevalent in this audit. However, despite all schools having to manage Covid requirements, managing emergency situations was still a theme in some schools.

12.5. In the previous audit Children in Care was identified as a theme and there were a number of schools which reported this as being a development area in the 2020/2021 audit. Likewise e-safety was highlighted in the previous audit and this continues to be a theme with schools reporting issues relating to internet filters and other requirements identified in the audit. Finally, the curriculum in relation to Relationships and Sex Education was also highlighted as a theme for some schools in both the 2018/2019 and 2020/2021 audit.

12.6. As the definition of the requirements was changed between audits it is difficult to make a direct comparison on requirements. However, there appears to be evidence that some schools have made progress while others have reported lower levels of implementation than in the earlier audit. This may be due to interpretation of the questions by individual schools, something changing in their arrangements, a change in the definition of requirements or misreporting arrangements in one of the audits.

12.7. It is important to recognise that it has been a mandatory requirement for this audit that all schools must share the results of their individual audits with their governing bodies, trustees or proprietors. This was recommended by not previously enforced in the 20218/2019 audit and it is anticipated this change should help raise awareness of areas for improvement and drive positive change.

13. Summary

13.1. Based on the responses to the safeguarding audit, schools have reported that they have most of the arrangements in place or have agreed action plans to ensure that controls are in place.

13.2. The audit has highlighted a number of themes which also coincide with fundamental weaknesses in safeguarding procedures identified from local Ofsted inspection relating to:

- Safer recruitment practices
- Governor and leaders understanding and oversight of child protection matters
- Systems to check the safety of pupils not in school
- Awareness of safeguarding
- Issues relating to online safety

13.3. As a result of the audit, all schools which responded to the audit should have identified areas for development which should have been overseen by the governing body, trustees or proprietors. There are a number of relatively easy achieved actions that schools can implement to ensure that they have adequate arrangements in place in areas which need development. For example, it should be easily achievable for all schools to have acceptable use of technology policies, staff/pupil relationship and use of social media policies. It is the responsibility of the governing bodies, trustees and proprietors to ensure that safeguarding arrangements are in place. However, there are a number of areas where they NYSCP and its partners can provide support to schools to improve safeguarding arrangements.

14. Actions as a Result of the Audit

14.1. Recommendations were presented to the Learning and Improvement Subgroup

14.2. A Task and Finish Group was established to review the findings and identify specific actions from the audit.

14.3. An action plan has is being developed to identify actions which the NYSCP and its partners can contribute to assist schools in ongoing development to achieve the requirements outlined in the audit, taking into account the changes in statutory guidance for Keeping Children Safe in Education 2021.

14.4. A webinar is planned to feed back to all schools the findings of the audit and the key changes from Keeping Children Safe in Education 2021.

14.5. The findings of the audit to be shared with all schools.

14.6. A 7 point briefing to be developed and shared on the NYSCP website.

.**Author and Date**

Haydn Rees Jones, Policy and Development Officer

19 August 2021