



# Education Safeguarding Policy and procedures Health Check

A safeguarding audit tool for use by NSPCC Senior Consultants  
in assessing school safeguarding policies and procedures

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NSPCC Consultancy Service  
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St Patrick's Catholic Voluntary Academy

29<sup>th</sup> June 2023

**EVERY CHILDHOOD IS WORTH FIGHTING FOR**

## How the health check process works

1. Schools complete the application form providing details of their school and the context for requesting the Health Check
2. Schools send the application form along with all the relevant policy documents to the NSPCC Consultancy Team.
3. A Senior Consultant is allocated to the assessment. They will check that they have all the necessary information and contact the school for an initial discussion. This discussion will also confirm whether or not the Health Check will be appropriate for the school.
4. The Senior Consultant completes the Health Check document, rating each element and providing some suggestions for improvement where required.
5. The completed Health Check document is returned to the contact at the school.
6. The school can contact the Senior Consultant to discuss the ratings and answer any questions.

## Introduction to the checklist

All schools must have procedures in place for how they will respond to a concern about a child or young person's safety, how to protect staff, and how they will manage any allegations/concerns about an adult's behaviour towards child/young people. This checklist has been developed in order to provide a standardised approach to assessing the quality of a school's core safeguarding policy and procedures. It is a generic tool and will not capture everything as this will depend on the nature of each school and its local context. The final section will provide some guidance on issues of particular relevance. There is no weighting system for each element but shortcomings that could have a serious impact on the children's safety or wellbeing are highlighted.

Not all safeguarding policies and procedures will follow the same format as schools may have different styles in how they write and present their policies and procedures, or follow local guidance or formats. They may have four separate documents as opposed to one (a safeguarding policy, managing concerns about a child, managing allegations against staff/volunteers, and a code of conduct/behaviour). Some schools may blur the boundaries between policy and procedure and may arrange their safeguarding documents differently without any detriment to their safeguarding practice. What does matter is that broadly all the content that is identified in this checklist is contained within the safeguarding policy and procedures of the school.

## Definitions

A **policy** is a brief statement of a set of principles and intent set in the context of relevant legislation and guidance.

The **procedures** are a more detailed set of ordered instructions on how to put a principle or intention into practice. An example of a principle or intention might be 'We take all complaints and allegations against staff and volunteers seriously', and would be included in a policy. A procedure linked to this principle would then describe clearly who in the school does what if such a complaint or allegation is made.

## The core safeguarding policy and procedures

By this we mean the following key areas of content:

- A safeguarding policy statement
- Details of the safeguarding structure within the school including the role of the designated safeguarding lead
- A code of conduct/behaviour for staff and volunteers
- The procedures for responding to child protection concerns and disclosures
- The procedures for responding to child-on-child abuse
- The procedures for dealing with safeguarding allegations or concerns about a staff member or volunteer
- Record keeping and information sharing

There are a number of other related policies and procedures which should be alluded to in the overarching safeguarding policy but that require their own procedures. They may cover issues wider than safeguarding, and they include policies and procedures on:

- Safer recruitment
- Online safety
- Anti-bullying
- Complaints
- Whistleblowing
- Health and safety
- School visits and residential trips
- Work experience
- Behaviour and discipline
- Lone working (if applicable)
- Intimate care
- Vulnerable adults (if school has pupils over 18 years of age)

This health check process does not provide detailed feedback on these related policies but they can be reviewed by a senior consultant as an additional piece of work.

## How the policies and procedures are scored

The rating method is to mark each element as either Requires improvement (R), Fit for purpose (F), or Best practice (B).

If the documents supplied by a school do not enable us to give a rating for a particular element, this will be scored as Insufficient information (II).

## Intellectual property and copyright

All intellectual property in this tool belongs to the NSPCC. This tool has been developed by the NSPCC and therefore must not be altered, shared or used for any other purposes, commercial or otherwise, unless prior written permission has been obtained from the NSPCC.

This assessment was completed on the basis of the following documents:

Child Protection and Safeguarding policy  
Code of Conduct (employees)

This assessment covers the adequacy of the documentation alone and cannot provide any assurance about the quality of practice.

## Our portfolio of health check tools

We provide a 'health check' service to support you in evaluating the suitability of your current safeguarding standards across a range of policy documents and specialist areas. Our current portfolio of safeguarding audit tools includes:

<b>For organisations working with children</b>	<b>For schools and colleges</b>
<b>Organisational safeguarding policy and procedures health check</b>  Review of safeguarding policies and procedures for organisations working with children	<b>Education safeguarding policy and procedures health check</b>  Review of safeguarding policies and procedures for schools and colleges
<b>Safer recruitment policy and procedures health check</b>  Review of safer recruitment policies and procedures for organisations working with children	<b>Safer recruitment in education policy and procedures health check</b>  Review of safer recruitment policies and procedures for schools and colleges

If you are interested in our other health check services or would like to find out more about our broader consultancy offer, please contact our customer service team on 0808 800 5000 or at [organisationalsafeguarding@nspcc.org.uk](mailto:organisationalsafeguarding@nspcc.org.uk).

## Section 1: Safeguarding Policy Content

Element	Requires improvement	Fit for purpose	Best practice	Rating and notes: R/F/B/II
<b>1.1 Clarity of language and structure</b>	Language obscure or vague; policy contains confusion and contradictions; structure is hard to follow; hard to see how this document fits within the statutory safeguarding framework.	Structure of document is clear and well laid out. Language is precise and easy to understand. The document makes sense in the context of other safeguarding documents and practice in the school.	Additional elements are included to make the document clearer e.g. use of numbering or bullet points, flow charts or diagrams, summary etc.	<p>B- The language throughout is clear and articulate.</p> <p>Additional elements such as a table of contents, bullet points, flow charts and tables make the content readable and accessible.</p> <p>The structuring and order of the document is effective and makes sense.</p> <p>There is a definitions section that usefully explains some of the terms used in the document,</p>
<b>1.2 A whole school approach to safeguarding is stated.</b>	Generic content or commitment to safeguarding limited. Content cut and pasted from other documents, out of date references or missing content.	States that safeguarding is everyone's responsibility and a whole school approach is taken. Makes a clear statement about the school's commitment to safeguarding all children and young people. States how safeguarding is part of the school's culture and ethos.	States that safeguarding is everyone's responsibility and a whole school approach is taken. The content is specific to the school's pupils, families and community. There is a clear commitment to keeping all children and young people safe and working with others to do so. States how safeguarding is part of the school's culture and ethos.	<p>B- The policy clearly states that safeguarding and child protection is everyone's responsibility (5. Roles and responsibilities)</p> <p>The document highlights the school's whole school approach to preventative safeguarding education.</p> <p>There are references throughout the policy to the importance of working with others to ensure the welfare of all the children and young people who attend the school.</p>

<p><b>1.3 Reference to equalities, diversity and inclusion stating that all children and young people have a right to be protected from abuse, regardless of background, circumstances or protected characteristics.</b></p>	<p>Does not make any reference to equalities, diversity and inclusion.</p>	<p>Recognises that some pupils have additional vulnerabilities and the barriers that they might face. States that all children and young people have equal access to services to meet their needs.</p>	<p>Includes information about the safeguarding needs of specific groups of vulnerable children, for example those with SEND, Looked After Children, Young Carers and Children Missing from Education. Refers to related policies, and inspires confidence that the school will make sure that all young people receive the services/support they need, including access to specialist support.</p>	<p>B- The document recognises that some children have an increased risk of abuse.</p> <p>The policy identifies specific groups of vulnerable young people and states that ‘all children have the same protection regardless of any barriers they may face’ (4 Equality statement)</p> <p>The Legislation and statutory guidance section references the Safeguarding Vulnerable Groups Act 2006</p> <p>Consider adding links to related policies here such as the Designates Teacher Looked After and Previously Looked After Children policy and the Equality Policy</p>
<p><b>1.4 Applies to all staff and volunteers</b></p>	<p>Does not say who the policy applies to, or misses out significant groups.</p>	<p>Makes it clear that all staff and volunteers, governors and trustees are included. States that the policy is given to and explained to all members of staff and volunteers on induction.</p>	<p>Makes it clear that all staff and volunteers are included, and specifically mentions the types of roles in the school, including governors and trustees (where appropriate). The policy is given and explained to all members of staff and volunteers on induction. Its applicability to others with whom the school works in partnership with or contracts in is clarified, including visitors, agency staff and contractors.</p>	<p>B- The document states that the policy applies to all staff, volunteers, and governors.</p> <p>Ensuring that all staff and volunteers are informed of safeguarding policies and responsibilities on induction is listed as a responsibility of the headteacher. (5 Roles and responsibilities)</p>
<p><b>1.5 Relevant legislation and guidance</b></p>	<p>No reference to the legal framework or guidance supporting safeguarding, or referencing inappropriate or outdated guidance.</p>	<p>Refers to Keeping Children Safe in Education 2022, The Prevent Duty, and the Children Act 1989.</p>	<p>All relevant, correct versions of legislation and guidance referenced.</p>	<p>B- List of up-to-date legislation is provided</p>

<p><b>1.6 Role of the governing body/trustees (as appropriate)</b></p>	<p>Not mentioned or vague or generic mention of the responsibilities for safeguarding.</p>	<p>A clear statement of the governing body/trustees' responsibility for safeguarding and the name and contact details of the nominated governor for safeguarding. The role of the governors/trustees is included in the policy which references Keeping Children Safe in Education (2022).</p>	<p>A clear statement of the governing body/trustees' responsibility for safeguarding and the name and contact details of the nominated governor for safeguarding. A statement or series of statements that describes how the governors/trustees support safeguarding in the school which reflects Keeping Children Safe in Education (2022).</p>	<p>B- The responsibilities of the governing body are clearly outlined along with the name and contact details of the chair of governors.</p>
<p><b>1.7 Role of Designated Safeguarding Lead (DSL) (further detail of role is covered in section 2)</b></p>	<p>Not mentioned or contact details not given.</p>	<p>DSL and deputy DSL contact details given.</p>	<p>Both the DSL and deputy mentioned with contact details, plus the SLT member with responsibility for safeguarding (who supports the DSL) and the nominated safeguarding governor.</p>	<p>B- Contact details are provided for all members of the safeguarding team</p>
<p><b>1.8 Categories and description of abuse/concerns (or may be included in overarching policy or listed in procedure for dealing with concerns)</b></p>	<p>Not included, or uses non-standard or out-dated definitions.</p>	<p>Includes definitions of abuse and neglect from the list of the specific safeguarding issues detailed in Part One of Keeping Children Safe in Education (2022). Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues are referenced, including CSE, CCE and FGM.</p>	<p>Includes definitions of abuse and neglect from the list of the specific safeguarding issues detailed in Part One of Keeping Children Safe in Education (2022). Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues are referenced, including</p>	<p>B- Clear and accessible definitions of abuse and the different types of abuse are provided in appendix 1 of the policy.</p> <p>Detailed information on specific safeguarding issues such as CCE and FGM is provided in appendix 4.</p>

			CSE, CCE and FGM. Reference is made to particular contextual safeguarding concerns that impact on the school and its pupils.	
<b>1.9 Concerns about mental health can also be an indicator of abuse or risk of abuse</b>	Not included	Mental health concerns are recognised as a possible indicator of abuse or risk of abuse, neglect or exploitation.	Mental health concerns are recognised as a possible indicator of abuse or risk of abuse, neglect or exploitation. and should be reported to the DSL.	<p>B- Section 7.6 of the document explains that mental health problems can be an indicator of abuse.</p> <p>Staff are instructed to report any concerns to the DSL.</p> <p>The academy may consider developing this further, possibly with a separate policy and procedures document.</p>
<b>1.10 Statement about how the school responds to concerns about radicalisation and extremism under the Prevent Duty.</b>	Not mentioned.	There is a clear statement about how the school responds to concerns, including making referrals to Channel where appropriate. The role of the DSL in the process is made clear.	There is a clear statement about how the school responds to concerns, including making referrals to Channel where appropriate. The role of the DSL in the process is made clear. There is reference made to how the school will work with other agencies.	<p>B- The document states that the academy will work with local safeguarding partners and the Police when assessing the risk of children being drawn into terrorism.</p> <p>Staff are instructed to follow the procedures in the policy for making a referral if they have any concerns about radicalisation.</p> <p>The role of the DSL is made clear and includes reference to the Channel programme.</p> <p>Contact details for the DFE extremism helpline are included in section 7.5 of the policy.</p>

<p><b>1.11 A statement regarding the mandatory reporting by teachers about FGM concerns is included.</b></p>	<p>Not mentioned.</p>	<p>There is a statement which makes the mandatory reporting duty for teachers clear.</p>	<p>There is a statement which makes the mandatory reporting duty for teachers and the consequences of not reporting clear. The policy includes links to further sources of information, support and advice.</p>	<p>B- The policy includes a statement that refers to the mandatory reporting of FGM.</p> <p>There is an external link to the Sheffield Children Safeguarding Partnership Child Protection and Safeguarding Procedures Manual that gives guidance on how to respond to FGM concerns.</p>
<p><b>1.12 Child on child abuse is included in the policy.</b></p>	<p>Not included.</p>	<p>Is included and recognised as a safeguarding issue.</p>	<p>Is included and recognised as a safeguarding issue. Reference is made to other policies and procedures such as bullying, behaviour and online safety.</p>	
<p><b>1.13 There is a definition of child on child abuse</b></p>	<p>Not given, or a general definition which does not capture all of the elements.</p>	<p>There is a statement to the effect that child on child abuse can take different forms and that it should never be tolerated or passed off as 'banter' or 'having a laugh'. The definition includes bullying, physical abuse, sexual violence and sexual harassment, consensual and non-consensual sharing of nude and semi nude images. upskirting, initiation and hazing rituals. The definition recognises that child-on -child abuse can take place in and out of school and online.</p>	<p>There is a statement to the effect that child on child abuse can take different forms and that it should never be tolerated or passed off as 'banter' or 'having a laugh'. The definition includes bullying, physical abuse, sexual violence and sexual harassment, consensual and non-consensual sharing of nude and semi nude images. upskirting, initiation and hazing rituals. The definition recognises that child-on -child abuse can take place in and out of school and online.</p>	<p>B- There is a detailed section included on child on child abuse.</p> <p>The document explicitly explains that child on child abuse shouldn't be "passed off as banter".</p> <p>The policy outlines steps that schools should take to minimise the risk of child on child abuse.</p> <p>The list of actions that constitute child on child abuse includes online behaviours.</p>

<p>1.13 Procedure to follow if there are concerns about child on child abuse is included</p>	<p>Not mentioned.</p>	<p>Procedures are in line with Keeping Children Safe in Education (2022). There is a procedure for responding to concerns about child on child abuse, supporting victims, perpetrators and others affected. This includes offline and online behaviours.</p>	<p>It is recognised that no reports of child-on-child abuse does not mean it is not happening. Procedures are in line with Keeping Children Safe in Education (2022). There is a procedure for responding to concerns about child on child abuse, supporting victims, perpetrators and others affected. The procedures include details of how allegations against pupils will be managed. The policy and procedure reflects the diversity of the pupil population and prioritises safeguarding needs of all pupils.</p>	<p>B- Staff are instructed to report concerns to the DSL and follow the procedures in section 7 of the document to record any concerns.</p> <p>This section of the document prioritises the safeguarding needs of all pupils.</p>
<p>1.14 Policy includes indicators of involvement in serious violent crime</p>	<p>Not mentioned or out of date information.</p>	<p>Signs and indicators are included in main policy or appendices</p>	<p>Signs and indicators are included in main policy or appendices. The policy includes the risk factors associated with involvement in serious violent crime There are links to the guidance <a href="https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence">https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence</a> and <a href="https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines">https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines</a></p>	<p>F- Indicators of involvement in serious violent crime are included in appendix 4.</p> <p>Include links to the following guidance:</p> <p><a href="https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence">https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence</a></p> <p>and</p> <p><a href="https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines">https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines</a></p>

<p><b>1.15 The policy includes information on how pupils will be taught about safeguarding, including online safety</b></p>	<p>This is not included.</p>	<p>The policy includes information about the school's approach to teaching about safeguarding and how it links to the curriculum. Links to policy documents with greater detail are given. Reference is made to the RE/RSE curriculum.</p>	<p>The policy includes information about the school's approach to teaching about safeguarding and how it links to the curriculum. Procedures for reporting safeguarding concerns which arise from lessons are made clear.</p> <p>Links to policy documents with greater detail are given. Reference is made to the RE/RSE curriculum.</p>	<p>B- The policy makes it clear that safeguarding topics are taught in the curriculum and specifies teaching that takes place around online safety and the sharing of nudes.</p> <p>The academy's RSHE programme is detailed and includes several safeguarding topics.</p> <p>Other more detailed policy documents are linked to the policy.</p>
<p><b>1.16 The school's commitment to working with safeguarding partners is stated</b></p>	<p>Not mentioned or terminology outdated.</p>	<p>Commitment to multi-agency working is stated and there is reference to locally agreed arrangements for working with the safeguarding partners.</p>	<p>Commitment to multi-agency working is stated and there is reference to locally agreed arrangements for working with the safeguarding partners. The role of the DSL in multi-agency working is included in the policy.</p>	<p>B- The responsibilities of the DSL listed in the policy include working with external agencies. Local safeguarding teams are referenced throughout the document.</p>
<p><b>1.17 Essential contact details provided (may be attached as an appendix to procedures)</b></p>	<p>None provided or contact details are out of date.</p>	<p>Designated Safeguarding Lead's details provided, plus Children's Social Care, Local Authority Designated Officers and the Police.</p>	<p>Details are provided for essential contacts both internally (Designated Safeguarding Lead, their deputy, and the senior lead for safeguarding) and externally (Children's Social Care, designated person in Local Authority for dealing with allegations against staff or volunteers; Police. Other contacts include local and national organisations such as Child Exploitation Online Protection Centre (CEOP); NSPCC helpline and</p>	<p>B- All relevant safeguarding contacts and external agencies contact details are included in the policy.</p> <p>Consider including external agencies contact details in the important contacts section of the policy</p> <p>CEOP- 0370 496 7622</p> <p>NSPCC- 0808 800 5000</p> <p>Childline- 0800 1111</p>

			whistleblowing helpline, Childline, The Mix.	
<b>1.18 Review arrangements for the policy and related procedures</b>	No reference to the need to review the policy; policy is out of date and not been reviewed or updated in the last 12 months.	Commitment to policy being reviewed at least annually, and when there are significant changes in legislation and guidance.	Commitment to policy being reviewed at least annually, and when there are significant changes in legislation and guidance; date of last review; lead person responsible for conducting review is named.	B- There are clear monitoring arrangements stated within the policy (section 16 Monitoring arrangements)  The individual responsible for reviewing the document is named in section 16.  The responsibilities of the governing body include evaluating the policy.
<b>1.19 The policy is made publicly available</b>	No link on the website.	The policy is available via the school website and the link to this is clear. Parents and others are reminded that they can contact the school for a hard copy of the policy.	There is a safeguarding page or section on the school website which includes a link to the policy. Parents and others are reminded that they can contact the school for a hard copy of the policy.	F- The policy is available on the academy's website.  The policy demands that the headteacher shares the policy with parents/carers when their child joins the school.  Consider including the possibility of parents accessing a hard copy.
<b>1.20 The policy describes the school's arrangements for safeguarding and remote learning.</b>	Not included.	DfE advice is included in the policy.	DfE guidance is included in the policy and applied to the school's context.	RI- There is no reference to remote working in the policy.  However, this is something that the academy needs to determine whether including information about remote learning is relevant to their cohort at this moment in time.

## Section 2: Role of the Designated Safeguarding Lead (DSL)

Element	Requires improvement	Fit for purpose	Best practice	Rating and notes R/F/B/II
<b>2.1 Clarity of language and structure</b>	Language obscure or vague; documents relating to the DSL are non-existent or contain confusion and contradictions; structure is hard to follow; hard to see how they fit within overall safeguarding framework.	Structure of documents is clear and well laid out. Language is precise and easy to understand. The documents make sense in the context of other safeguarding documents produced by the school.	Additional elements to make it a clearer document e.g. use of numbering or bullet points, helpful flow charts or diagrams, summary etc.	B- Bullet points in this section make the information very clear and accessible.
<b>2.2 There is a named Designated Safeguarding Lead who is a member of the Senior Leadership Team.</b>	No-one is given the role of DSL; the DSL role is given to a junior member of staff/volunteer.	The named DSL is a member of the senior leadership team. There is an outline of his/her responsibilities which is compliant with Keeping Children Safe in Education (2022).	The named DSL is a member of the senior leadership team. There is an outline of his/her responsibilities which is compliant with Keeping Children Safe in Education (2022).	B- There is a named DSL who is a member of the school leadership team (headteacher)  The policy includes an outline of their responsibilities.
<b>2.3 There are arrangements for someone to deputise for the DSL.</b>	There are no deputising arrangements.	The DSL has a deputy or more than one deputy who covers in their absence and their contact details are provided. It is clear that the DSL retains the overall lead responsibility for safeguarding in the school.	The DSL has a deputy who covers in their absence and their contact details are provided. It is clear that the DSL retains the overall lead responsibility for safeguarding in the school. Where there is a safeguarding team, roles and responsibilities are described.	B- The contact details of the Deputy DSL are provided in the policy.  It is clear that the DSL has overall responsibility for safeguarding in the academy, however arrangements are in place for when the DSL is unavailable.
<b>2.4 There is clarity about who is responsible for the strategic aspects of the DSL role, and</b>	There is no clarity on this point.	There is an acknowledgement that the role has both strategic and operational components. It is clear whether one DSL	There is an acknowledgement that the role has both strategic and operational components. It is clear whether one DSL	B- The responsibilities of the DSL make it clear that they are responsible for both strategic and operational facets of the role.

who is responsible for the operational aspects (note: it may be the same person).		covers all elements of the role, or whether it is split.	covers all elements of the role, or whether it is split. It is clear who has the ultimate lead responsibility for safeguarding in the school.	
2.5 The DSL has attended training for the role and regularly updates his/her knowledge of safeguarding issues.	There is no information about training for the DSL, or the last DSL training attended was more than two years ago.	The DSL has attended training/updates specifically for the role within the last 2 years. The DSL has attended training on the Prevent duty and other specific needs.	The DSL has attended training/updates specifically for the role within the last 2 years. The DSL has attended training on the Prevent duty and other specific needs. In addition to formal training the DSL regularly refreshes their knowledge at least annually through e -bulletins or meetings with other DSLs.	B- The policy clearly sets out in a table at the beginning of the document what training has been completed, when it has been completed and when it is due to renewed.  The DSL has completed Senior Designated Safeguarding Lead provided by the NSPCC and Prevent training.  The policy states that the DSL and deputy DSL will update their knowledge and skills at regular intervals.
<b>2.6 It is clear that the DSL should be the first point of contact for anyone with a safeguarding concern, including online safety.</b>				
2.6 It is clear that the DSL should be the first point of contact for anyone with a safeguarding concern, including online safety.	There is no clarity about who the first point of contact should be.	It is stated that the DSL is the first point of contact and contact details are given.	It is stated that the DSL is the first point of contact and contact details are given. Contact details are made available to visitors, supply teachers and agency staff.	B- It is clear throughout the policy that the DSL is the first point of contact for any safeguarding concerns.
2.7 It is clear that the DSL has a responsibility to make referrals to the Channel programme where there are concerns about radicalisation.	There is no clarity on this issue.	It is stated that it is the DSL's responsibility.	It is stated that it is the DSL's responsibility and that the school is committed to working in partnership with other agencies where there are concerns about radicalisation.	B- It is clearly stated that the DSL has the responsibility of making a referral to the Channel programme if there are concerns about the radicalisation of a young person.

<p>2.8 It is clear that the Designated Safeguarding Lead or another named role has a role in supporting staff who have been involved in a safeguarding matter where there are concerns about a child.</p>	<p>No reference is made as to who will support staff/volunteers.</p>	<p>There is acknowledgement that responding to concerns about child protection can be upsetting. It is clearly stated in procedures that the DSL has this responsibility. There is recognition that that the DSL acts as a source of advice and support to other staff.</p>	<p>There is acknowledgement that responding to concerns about child protection can be upsetting. It is clearly stated in procedures that the DSL has this responsibility. There is recognition that that the DSL acts as a source of advice and support to other staff. The school also signposts staff to external sources of support.</p>	<p>RI- While the policy states that it is the role of the DSL to support staff with safeguarding issues, there isn't any explicit acknowledgment that responding to concerns about child protection can be upsetting.</p> <p>Consider including links for staff to external sources of support</p>
<p>2.9 It is clear that the DSL has responsibility to ensure that all staff received appropriate safeguarding training/updates at least annually.</p>	<p>There is no clarity on this issue.</p>	<p>It is clearly stated in procedures that the DSL has this role and includes details about how and when training will be delivered.</p>	<p>It is clearly stated in procedures that the DSL has this role and arrangements for staff who miss annual training or join part way through the school year.</p>	<p>B- The policy states that it is the responsibility of the headteacher to ensure that all staff receive safeguarding training. (The headteacher is also currently the DSL)</p>
<p>2.10 It is clear who has the responsibility for the regular review and updating of the safeguarding policy, and for promoting understanding and awareness of the policy to staff/volunteers and young people.</p>	<p>No clarity is given.</p>	<p>It is clearly stated who has this role and the date of the last review/update is included.</p>	<p>It is clearly stated who has this role. The date of the last review and next expected review/update is included.</p>	<p>B- It is clearly stated who is responsible for the review of the policy. The date of the last review and next expected review is included.</p>
<p>2.11 It is clear who has responsibility for the monitoring and evaluation of the</p>	<p>No clarity is given.</p>	<p>It is stated that this is the role of the DSL and explains how the DSL ensures that all members of staff and</p>	<p>It is stated that this is the role of the DSL and explains how the DSL ensures that all members of staff and</p>	<p>B- The policy states that it is the responsibility of the governing body to monitor and evaluate the policy and that it is</p>

safeguarding policy implementation and practice.		volunteers are made aware of the policy.	volunteers are made aware of the policy. It makes specific mention of the DSL working together with the governing body/trustees to ensure the policy is implemented.	the responsibility of the headteacher to ensure that it is implemented effectively.  The policy is shared with all staff during the induction process.
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### Section 3: Child protection procedures

Element	Requires improvement	Fit for purpose	Best practice	Rating and notes R/F/B/II
<b>3.1 Clarity of language and structure.</b>	Language obscure or vague; documents relating to dealing with concerns about a child are non-existent or contain confusion and contradictions; structure is hard to follow; hard to see how they fit within overall safeguarding framework.	Structure of documents is clear and well laid out. Language is precise and easy to understand. The documents make sense in the context of other safeguarding documents and procedures.	Additional elements to make it a clearer document e.g. use of numbering or bullet points, helpful flow charts or diagrams, summary etc.	B- The language around procedures is clear.  Section 7 includes a flowchart indicating what to do when staff have concerns about a child.
<b>3.2 The procedure provides instructions on what to do if the young person is in immediate danger</b>	The procedure does not take account of emergencies or immediate danger.	Clear and succinct direction is provided for emergency situations and where children and young people may be in immediate need of protection.	Clear and succinct direction is provided for emergency situations and where children and young people may be in immediate need of protection. The procedure stresses the need to act immediately and inform the DSL as soon as possible. A flowchart is included.	B- Section 7.1 clearly explains the steps that need to be taken if a child is in immediate danger.  The guidance includes informing the DSL as soon as possible and the possibility of making a referral independently.  Staff are signposted to the police in the event that a child or young person is in immediate danger.

<p>3.3 There is an up-to-date, written procedure for dealing with concerns that a young person may have been harmed or is at risk of abuse including online.</p>	<p>No procedure exists or the procedure is vague and missing information about roles and responsibilities of staff and volunteers.</p>	<p>A written procedure exists which lays out very clearly the actions to be taken, by whom and in what timescales.</p>	<p>A written procedure exists which lays out very clearly the actions to be taken, by whom and in what timescales. It is supported by flow charts.</p>	<p>B- There is a clear procedure in the policy for dealing with safeguarding concerns which includes time scales.</p> <p>A flowchart is included which provides further clarity.</p> <p>Consider amending the flowchart to include what needs to happen if the child is in immediate danger.</p>
<p>3.4 There is a procedure for how the school will respond to concerns relating to non-recent (historic) concerns</p>	<p>There is no reference to non-recent abuse.</p>	<p>The procedure states how concerns of this type should be reported and how the school will respond.</p>	<p>The procedure states how concerns of this type should be reported and how the school will respond. The school's duties in referring to the TRA, DBS and Police is included in the procedures.</p>	<p>B- The policy clearly explains how non-recent allegations will be dealt with.</p> <p>The document explains that the academy will follow the local authority's guidance for dealing with non-recent allegations and also contact the police.</p>
<p>3.5 Unless they are included in the overarching policy, the procedure lists the definitions, signs and indicators of different types of abuse, using the most up-to-date government guidance</p>	<p>No definitions, signs and indicators are included either here or in the overarching policy.</p>	<p>Definitions, signs and indicators of abuse are listed here or in the overarching policy. This includes categories of abuse and neglect and child-on-child abuse.</p>	<p>Definitions, signs and indicators of abuse are listed here or in the overarching policy. This includes categories of abuse and neglect and child-on-child abuse. Abuse occurring in specific circumstances is also included, for example online abuse, CSE, CCE, FGM.</p>	<p>B- Definitions, signs and indicators of abuse are listed in the safeguarding policy.</p>
<p>3.6 The procedure provides staff and volunteers with clear, appropriate guidance on how to talk to a young person who has disclosed abuse.</p>	<p>There is no guidance provided on talking to young people who disclose, or the guidance is inappropriate.</p>	<p>There is clear guidance which offers appropriate instruction to staff and volunteers on how to respond.</p>	<p>There is a statement which states that concerns will be taken seriously and children will be listened to. There is clear guidance which offers appropriate instruction to staff and volunteers on how to respond and signposts staff to sources of support.</p>	<p>F- Guidance is given to staff on how to respond to a disclosure. The guidance is emphasised and split up using bullet points.</p> <p>Include signposts to sources of support for staff who have dealt with disclosures or safeguarding incidents.</p>

<p><b>3.7 The procedure provides staff and volunteers with clear, appropriate guidance on when to talk to parents and carers about the concerns involving their child, and when <u>not</u> to do so</b></p>	<p>The procedure offers no help or instruction on this issue.</p>	<p>Clear instruction is provided on talking to parents and carers, and when not to do so. Staff and volunteers are reminded to discuss concerns with the DSL before contacting parents.</p>	<p>Clear instruction is provided on talking to parents and carers, and when not to do so. Staff and volunteers are reminded to discuss concerns with the DSL before contacting parents. There is a reminder that confidentiality is not a barrier to sharing safeguarding information.</p>	<p>B- Section 9 of the policy advises staff on the protocol for talking to parents and states that the DSL will take the lead when contacting parents.</p>
<p><b>3.8 The requirement to refer to a statutory child protection agency is made clear.</b></p>	<p>It is not clear whether referrals should be made to a statutory child protection agency; or the process is too long-winded; or there is a culture of dealing with child protection concerns internally.</p>	<p>The requirement to refer to children's social care or the police or the NSPCC is made clear; timescales are included. The option of consulting with other bodies (e.g. children's social care or the NSPCC helpline) is included in order to determine what to do in the face of uncertainty.</p>	<p>The requirement to refer to children's social care or the police or the NSPCC is made clear; timescales are included. The option of consulting with other bodies (e.g. children's social care or the NSPCC helpline) is included in order to determine what to do in the face of uncertainty. A flowchart is provided.</p>	<p>B- The policy makes it clear that a staff members first port of call when they have a concern about a child is the DSL. The policy then explains that the DSL will then decide how to proceed.</p>
<p><b>3.9 It is clear who has the responsibility to decide whether or not it is necessary to refer a case to children's social care (or police).</b></p>	<p>There is no clarity about who has the responsibility to decide whether or not it is necessary to refer a case to children's social care (or police); the procedures do not make it clear, and are muddled.</p>	<p>The policy makes clear that this is the responsibility of the DSL.</p>	<p>The policy makes clear that this is the responsibility of the DSL. It is clear who else should be contacted in this person's absence (in and out of office hours).</p>	<p>B- It is clear that deciding whether a referral to the police or children's social care is the responsibility of the DSL.  There is clear guidance on who should be contacted if the DSL is unavailable.</p>

<p>3.10 The procedure indicates who staff members and volunteers should speak to if they have a concern, and involves the Designated Safeguarding (DSL) and/or management appropriately.</p>	<p>No mention of who staff and volunteers should go to in order to discuss their concerns; no input or support from DSL or manager.</p>	<p>Role of DSL and managers is made clear, and that staff/volunteers are required to discuss their concerns with them. There is a timescale for reporting concerns. There is a clear message that staff and volunteers should not be dealing with concerns on their own, and that the school is there to support them.</p>	<p>Role of DSL and managers is made clear, and staff/volunteers are required to discuss their concerns with them and the timescale for doing so is clear. There is a clear message that staff and volunteers should not be dealing with concerns on their own, and that the school is there to support them. Feedback to the reporting member of staff or volunteer is included in the procedure.</p>	<p>B- It is clear throughout the policy that staff should speak with the DSL immediately if they have concerns about a child's wellbeing.</p>
<p>3.11 The procedure clarifies safeguarding arrangements when working in partnership with other schools or at other venues (e.g. other schools or activity centres) on day and residential school visits and on work experience where applicable.</p>	<p>No mention of these arrangements.</p>	<p>Clarifies the procedures for safeguarding arrangements when working in partnership with other schools or at other venues i.e. whose safeguarding procedures are to be followed and any link back to their own procedures.</p>	<p>Clarifies the procedures for safeguarding arrangements when working in partnership with other schools or at other venues i.e. whose safeguarding procedures are to be followed and any link back to own procedures. There is a link to risk assessment procedures where relevant.</p>	<p>B- The policy states that the guidance in the document should be followed when undertaking extended school and off-site activities.</p>
<p>3.12 The procedure clarifies what to do if the response from children's social care or police is unsatisfactory.</p>	<p>No mention of any escalation process.</p>	<p>Provides guidance on how concerns will be escalated by the DSL and how staff and volunteers can escalate if they are not satisfied with the school based response.</p>	<p>Provides guidance on how the DSL will escalate a concern and how staff and volunteers can escalate if they are not satisfied with the response. This might also be included in a flow chart.</p>	<p>F- Staff are advised that if a child's situation does not seem to have improved after a referral has been made then the DSL or whoever made the referral should follow the local escalation procedures.</p> <p>Consider making this advice an explicit section and including the option of escalating a referral on the flowchart.</p>

3.13 The procedure explains possible outcomes of a referral to children's social care (e.g. Early Help, Child in Need, Child Protection).	No mention of this in the procedures.	The procedure explains that concerns may result in outcomes including Child in Need and Early Help.	The procedure explains that concerns may result in referrals including Child in Need and Early Help. A link to more information on these procedures is included in a flow chart.	B- There are multiple references made to early help throughout the policy.  Guidance is given on the Early Help assessment and links are given to local authority guidance.
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#### Section 4: Record Keeping and Information Sharing

Element	Requires improvement	Fit for purpose	Best practice	Rating and notes R/F/B/II
4.1 Clarity of language and structure	Language obscure or vague; documents relating to recording and information sharing are non-existent or contain confusion and contradictions; structure is hard to follow; hard to see how they fit within overall safeguarding framework.	Structure of documents is clear and well laid out. Language is precise and easy to understand. The document makes sense in the context of other safeguarding documents produced by the school.	Additional elements to make it a clearer document e.g. use of numbering or bullet points, helpful flow charts or diagrams, summary etc.	B- The Record Keeping section of the document utilises bullet points to make the information clear and accessible.
4.2 The school's policy and procedures on the recording and storage of information and information sharing in respect of safeguarding is provided.	There is no information about recording and sharing and storing information.	Information is given on how concerns relating to safeguarding are recorded and stored.	Information is given on how concerns relating to safeguarding are recorded and stored. It is clear that child protection records are stored securely and separately from other records and that access is restricted.	B- The policy follows clear regulations, legislation and guidance.

4.3 There is a clear procedure for recording concerns.	There is no clear procedure, or the procedure is lacking clarity.	There is a clear procedure with guidance given on how and where to record concerns, timescales and responsibilities.	There is a clear procedure with guidance given on how and where to record concerns, timescales and responsibilities. There is a link to the concerns form or the system used (e.g. My Concern or CPOMS)	B- A clear bullet pointed chronological procedure is provided in this section of the policy.  References are made to CPOMS.  Consider including a link to reporting systems
4.4 The policy/procedure stipulates the need to distinguish between fact, hearsay and opinion.	There is no mention of the need to distinguish between fact, hearsay and opinion.	The requirement to distinguish between fact, hearsay and opinion is made clear.	The requirement to distinguish between fact, hearsay and opinion is made clear. Furthermore, there is reference to the need to ensure that opinions expressed are relevant to the situation, respectful and appropriate in tone.	F- Section 7.2 advises staff on how to record a disclosure and instructs staff to 'stick to the facts.'  Consider advising staff that they are able to include opinions but that they must indicate that these are observations and opinions and not facts.
4.5 The procedure is specific about the need to record concerns, allegations, decisions and outcomes.	There is no mention of recording requirements. There is lack of clarity about the circumstances in which concerns should be recorded.	Record keeping is covered in the procedure. Roles and responsibilities and timescales for recording concerns are stated. A link to or a copy of the school's concerns form is included.	Record keeping is covered in the procedure. Roles and responsibilities and timescales for recording concerns are stated. A link to or a copy of the school's concerns form is included.	B- The guidance on record keeping and how to record disclosures are very clear in the policy.  Section 14 specifies that records must include details of how concerns were followed up and resolved and a note of any action taken and the reasons for the actions.
4.6 Reference to the need for adequate security measures in order to protect personal information in terms of safe storage and transmission of safeguarding records on school transfer	No reference is made to the need for security or mention of security measures are contained in the policy/procedure e.g. personal information to be labelled confidential and properly protected.	Security taken seriously in the policy/procedures, and adequate measures set out to protect personal information e.g. labelling, use of secure storage for hard copy files and computer equipment, use of encryption and passwords and secure processes in place to transmit information. This applies to pupils joining and leaving the school. It is clear that the DSL will follow up in	Security taken seriously in the policy/procedures, and adequate measures set out to protect information e.g. labelling, use of secure storage for hard copy files and computer equipment, use of encryption and passwords and secure processes in place to transmit information. This applies to pupils joining and leaving the school. It is clear	F- Section 14 (Record Keeping) of the policy states that confidential records will be held securely and only made available to those who have a right or professional need to see them.  It goes on to explain that information shared with other agencies is sent via secure systems.  Include details about the procedure for dealing with a breach of information security.

		cases where receipt of or requests for safeguarding information is not received.	that the DSL will follow up in cases where receipt of or requests for safeguarding information is not received. There is a procedure on what to do if there is a breach of information security in line with relevant legislation.	
4.7 Requirement for concerns that a young person may be in need or at risk of abuse to be recorded and placed on the young person's record, together with details on how the concerns have been dealt with.	No such requirement.	This requirement is specified and that it is the responsibility of the DSL to ensure it is done.	This requirement is specified and that it is the responsibility of the DSL to ensure it is done. It is also clear that access to this information is on a need to know basis and the decision rests with the DSL on a case by case basis.	RI- While the policy states that all safeguarding concerns, discussions, decisions made and reasons for those decisions must be recorded it doesn't stipulate that it is the responsibility of the DSL to ensure that this happens.  Include the statement that The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.
4.8 The school has a clear policy on time limits for retaining safeguarding records and arrangements for their secure destruction.	No clear policy on this.	Time limits for keeping and disposing of records are written down and reflect the type of records involved and the rationale for retention.	Time limits for keeping and disposing of records are written down and reflect the type of records involved and the rationale for retention. Retention periods are specified in line with local guidance or DfE.  See <a href="https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-september-2020.pdf">https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-september-2020.pdf</a>	F- The policy refers to a retention schedule but doesn't elaborate on this.  Include a link to guidelines on information retention  <a href="https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-september-2020.pdf">https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-september-2020.pdf</a>

<p><b>4.9 Policy/procedure states that consent should be sought for the sharing of confidential information unless this would jeopardise the safety and welfare of a young person in which case information should be shared without consent if necessary. There is a requirement that decisions about the sharing of confidential information without consent are made in line with an agreed process involving line management and/or the DSL.</b></p>	<p>There is no requirement or agreed process on sharing confidential information. No mention of the issue of consent when the school shares personal information. Or consent issues are seen as a block to the sharing of information that could jeopardise the safety of a young person.</p>	<p>The safety and welfare of children and young people is paramount. There is a written procedure for sharing confidential information that involves management and the Designated Safeguarding Lead. There is clarity on when to seek consent and that it is preferable to seek it and also when it is permissible to share information without consent. The responsibility of the DSL in this decision making is clear.</p>	<p>The safety and welfare of children and young people is paramount. It is clear when to seek consent and that it is preferable to seek it and also when it is permissible to share information without consent. The responsibility of the DSL in this decision making is clear and decisions and rationale for sharing without consent is included.</p>	<p>B- The policy is clear about when to seek consent and when it is acceptable to operate with consent or informing parents of concerns.</p> <p>The document makes it clear that the wellbeing and safety of young people is central to all decisions taken.</p>
<p><b>4.10 The school uses the principles set out in government guidance on information sharing to inform its policy: i.e. that information sharing should be necessary, proportionate, relevant, adequate,</b></p>	<p>There is no attention paid to these principles.</p>	<p>These principles are reflected in the approach taken by the school. It is stated clearly that confidentiality is not a barrier to sharing safeguarding information.</p>	<p>These principles are specifically referred to in the policy and procedure on information sharing. The policy makes reference to the principles contained in <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_pr">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_pr</a></p>	<p>B- A link to the government document on sharing information is included in the policy and it is made clear that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children</p>

accurate, timely and secure.			<a href="#">actitioners_safeguarding_ser vices.pdf</a> It is made clear that GDPR and the Data Protection Act should not be seen as a barrier to sharing information about the safety of a child.	
<b>4.11 Decisions about the sharing of confidential information are recorded</b>	There is no requirement to record decisions made around information sharing, or to make a note of who makes them.	Information sharing decisions are discussed with the DSL and required to be recorded.	Information sharing decisions are discussed with the DSL and required to be recorded. There is clarity about the decision making process.	B- The policy makes it clear that information sharing decisions must be discussed the DSL.

Section 5: Managing allegations against staff and volunteers procedures

Element	Requires improvement	Fit for purpose	Best practice	Rating and notes R/F/B/II
<b>5.1 Clarity of language and structure</b>	Language obscure or vague; documents relating to managing allegations and concerns about risks posed by staff or volunteers are non-existent or contain confusion and contradictions; structure is hard to follow; hard to see how they fit within overall safeguarding framework.	Structure of documents is clear and well laid out. Language is precise and easy to understand. The documents make sense in the context of other safeguarding documents produced by the school.	Additional elements to make it a clearer document e.g. use of numbering or bullet points, helpful flow charts or diagrams, summary etc.	B- The section is clear and utilises bullet points and subheadings to make the information accessible.

<p>5.2 There is an up-to-date, written procedure for dealing with allegations or concerns that a member of staff or volunteer may have harmed or present a risk to young people.</p>	<p>No procedure exists.</p>	<p>A written procedure exists that clarifies the process and actions required and which appropriately involved the DSL, senior managers and those with HR expertise.</p>	<p>A written procedure exists that clarifies the process and actions required and which appropriately involved the DSL, senior managers and those with HR expertise.</p>	<p>B- The procedure is clear, accurate and up-to-date.</p>
<p>5.3 The procedure is compliant with legislation and guidance.</p>	<p>The procedure ignores legislation and guidance.</p>	<p>The procedure is compliant with Part Four of Keeping Children Safe in Education (2022).</p>	<p>The procedure is compliant with Keeping Children Safe in Education (2022) and has been reviewed within the last 12 months.</p>	<p>B- The procedure is compliant with KCSIE 22. The policy is reviewed annually.</p>
<p>5.4 The procedure applies to all members of staff and volunteers. It mentions the three possible areas of investigation when such concerns arise: police investigation, statutory child protection investigation and internal disciplinary investigation conducted by the school.</p>	<p>The procedure misses out one or more of these areas of investigation or is vague about the different areas.</p>	<p>The procedure applies to circumstances in which an adult has behaved in a way that has harmed or may have harmed a child; has possibly committed a criminal offence against or related to a child; has behaved in a way that indicates he/she would pose a risk of harm to a child; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school (transferable risk). It is clearly stated that concerns should be reported.</p>	<p>The procedure applies to circumstances in which an adult has behaved in a way that has harmed or may have harmed a child; has possibly committed a criminal offence against or related to a child; has behaved in a way that indicates he/she would pose a risk of harm to a child; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school (transferable risk). It is clearly stated that concerns should be reported, to whom and the timescales for doing so.</p>	<p>B- The relevant section includes the four areas specified in section one of part four of KCSIE 22.</p> <p>The section could be enhanced by a flow diagram appendix showing the procedure.</p>

<p>5.5 The procedure prioritises the need to protect young people from any risk posed by individuals who are the subject of such concerns or allegations, whilst also recognises the need for such individuals to receive fair treatment from the school and support during the course of the investigation into the concerns.</p>	<p>The procedure is skewed towards protecting the interests of the staff member or volunteer; or else it omits the need to support and deal fairly with the person who is the subject of the allegations/ concerns.</p>	<p>The procedure keeps the young person's safety and welfare as the paramount consideration, but recognises the need to support the individual and to avoid making premature assumptions about what they may/may not have done.</p>	<p>The procedure keeps the young person's safety and welfare as the paramount consideration, but recognises the need to support the individual and to avoid making premature assumptions about what they may/may not have done.</p>	<p>B- The procedure as with all other safeguarding advice in the policy keeps the welfare of young people at the centre. However, the wellbeing of staff is also considered.</p>
<p>5.6 The procedure provides instructions on what to do if the member of staff/volunteer is with a young person in need of immediate medical attention or protection.</p>	<p>The procedure does not cover this possibility, or deals with it inappropriately.</p>	<p>Recognises that this could happen and makes a young person-centred, sensitive, workable response.</p>	<p>Recognises that this could happen and makes a young person-centred, sensitive, workable response. Flowchart is provided.</p>	<p>RI- There is no reference to this possibility in this section.</p> <p>However, there is guidance about what to do if a young person is at risk in other areas of the document.</p> <p>Include a statement reminding staff about the steps to take if a young person is in the need of immediate medical attention or protection</p>
<p>5.7 The procedure is specific about the need to record concerns and decisions and outcomes.</p>	<p>There is no mention of recording requirements.</p>	<p>Record keeping is covered in the procedure. The allegation outcomes used are substantiated, malicious, false, unsubstantiated and unfounded are defined as in Keeping Children Safe in Education (2022).</p>	<p>Record keeping is covered in the procedure, including the need to record rationale for decisions made, and wider links are made with the policy on recording and information sharing. The allegation outcomes used are substantiated, malicious, false, unsubstantiated and unfounded, are defined as in</p>	<p>B- The section covering allegations against staff (appendix 3) is very thorough and includes guidance on record keeping and sharing information.</p> <p>In line with KCSIE 2022 the allegation outcomes are included and defined.</p>

			Keeping Children Safe in Education (2022).	
5.8 The requirement to refer to the local authority and when to make a referral to the Disclosure and Barring Service (DBS) is made clear.	There is no reference to the legal duty to refer to the local authority designated officer or when to refer to the DBS.	Appropriate reference made to this legal requirement and who is responsible for making the referral(s) to the local authority or DBS.	Appropriate reference made to this legal requirement, who is responsible for making the referral and how the school will work with the LADO in this regard.	F- References are made to the legal responsibility to refer allegations to the LADO and the DBS.  Include details on whose responsibility it is to make these referrals.
5.9 The procedure indicates the person/people to whom staff members and volunteers should speak if they have a concern about a member of staff or volunteer.	No information is provided about where staff/ volunteers can turn if they have a concern.	Details given of whom to speak to if the allegation relates to a member of staff or volunteer, the head teacher, Chair of Governors or Proprietor.	Details given of whom to speak to if the allegation relates to a member of staff or volunteer, head teacher, Chair of Governors or Proprietor. The lines of reporting are clear and transparent.	B- Section 7.7 of the policy explains who staff should speak to if they have concerns about staff members.
5.10 The procedures clarifies what to do if the response is unsatisfactory given the level of concern.	No mention of any escalation/ resolution process.	Provides guidance on how to escalate a concern and use of the whistleblowing process.	Provides guidance on how to escalate a concern and use of the whistleblowing process. Signposts to a separate whistleblowing procedure and/or includes reference to the NSPCC whistleblowing helpline.	B- Section 13.3 of the document provides detailed guidance on whistleblowing with links to relevant documents and guidance including the NSPCC whistleblowing helpline.
5.11 There is a procedure for responding to concerns that do not meet the threshold for harm (low level concerns).	Not included.	There is a process in place to cover allegations of concerns that do not meet the threshold for harm.	There is a process in place to cover allegations of concerns that do not meet the threshold for harm. The process is linked to the staff code of conduct and the safeguarding policy and contributes to a culture of	B- Appendix 3 explains the procedure for dealing with low level concerns.

			openness, trust and transparency.	
5.12 There is a definition of low level concerns.	Not defined or vague.	The definition refers to behaviour that is inconsistent with the staff code of conduct, , including inappropriate conduct outside of work.	The definition refers to behaviour that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Some examples are given for illustration.	B- Low level concerns is defined, and examples are given.  Consider including a link to the staff code of conduct
5.13 There is a process for sharing, recording and responding to low level concerns.	Not included or unclear.	The process states that concerns must be shared with the DSL/DDSL or with the head teacher if the concern relates to the DSL/DDSL.	The process states that concerns must be shared with the DSL/DDSL or with the head teacher if the concern relates to the DSL/DDSL. The process clarifies the next steps to be taken.	B- The policy states that concerns should be reported to the headteacher or if they are regarding the headteacher they should be communicated to the chair of governors.
5.14 Low level concerns are recorded and kept confidentially.	No mention of this requirement.	The DSL's role in recording concerns is stated and that this information should remain confidential.	The DSL's role in recording concerns is stated and that this information should remain confidential. Records are reviewed regularly to identify potential patterns of behaviour.	B- The policy communicates that records must be reviewed regularly and kept confidential.
5.15 The criteria for reaching the harm threshold is explained.	No explanation.	The criteria for when to refer to the LADO is clarified.	The criteria for when to refer to the LADO is clarified and the process for managing allegations is subsequently followed. This may be illustrated in a flow chart.	B- The process for managing concerns is explained in a very thorough and detailed way.  Consider including a flowchart for added clarity.

Section 6: Code of conduct for staff/volunteers

Element	Requires improvement	Fit for purpose	Best practice	Rating and notes R/F/B/II
6.1 Clarity of language and structure	Language obscure or vague; code of conduct documents are non-existent or contain confusion and contradictions; structure is hard to follow.	Structure of documents is clear and well laid out. Language is precise and easy to understand.	Additional elements to make it a clearer document e.g. use of numbering or bullet points.	B: The code of conduct is clear and effectively presented. Contents, sub headings and bullet points make the information clear.
6.2 The policy states that the code is given to all new members of staff and volunteers on induction.	There is no mention of a code of conduct.	The policy states that the code is given to staff and volunteers as part of an process. New staff and volunteers are to sign to say they have received and read it.	The policy states that the code is given to staff and volunteers as part of an induction process. New staff and volunteers are to sign to say they have received and read it. The code is used as part of an ongoing induction/mentoring programme.	<p>RI- No details are given about when the code is given to staff or how when staff have read the code is recorded.</p> <p>Include a statement explaining that staff are required to read the code of conduct on induction and when it is updated.</p>
6.3 There are statements in the code to the effect that children's and young people's welfare is paramount; all children and young people are entitled to protection and treated equally; and the code applies to all staff and volunteers.	These elements are not stated in the code.	There are statements to this effect in the code which support the school's approach to safeguarding and how it contributes to a safeguarding culture. It is made clear that the code of conduct is part of the school's safeguarding procedures and applies to all staff and volunteers.	There are statements to this effect in the code which support the school's approach to safeguarding and how it contributes to a safeguarding culture. It is made clear that the code of conduct is part of the school's safeguarding procedures and applies to all staff and volunteers, including peripatetic, agency and temporary staff.	B- The code has a safeguarding section and makes it clear that the welfare of the young people staff work with is central to their role.

<p><b>6.4 The code includes statements promoting safer relationships, acceptable standard of staff behaviour and good practice in working with children and young people (as appropriate to the setting), including those learners with additional needs.</b></p>	<p>There is no code of conduct or statements are vague or generic.</p>	<p>These are included and are appropriate to the setting/age of pupils, including those with additional needs, and forms a comprehensive set of appropriate and inappropriate behaviours. The consequences of inappropriate unprofessional behaviour and misconduct are made clear.</p>	<p>These are included and are appropriate to the setting/age of pupils, including those with additional needs. There is clarity on expected and appropriate behaviours and concerning, problematic and inappropriate behaviours so that there is no ambiguity. The consequences of inappropriate or unprofessional behaviour and misconduct are made clear. There are links to other procedures including managing allegations, staff disciplinary, performance management. This may include the role of HR.</p>	<p>B- This is made clear throughout the code of conduct with examples of inappropriate behaviour included.</p>
<p><b>6.5 Reflects all aspects of school life, including school visits and residential trips, work experience (if applicable) and extra-curricular activities.</b></p>	<p>Code is very generalised and does not take into account the specific activities and developmental needs of the children and young people.</p>	<p>Code offers specific guidance on the work undertaken by the school and fully reflects the ages, needs and activities.</p>	<p>Code offers specific guidance on the work undertaken by the school and fully reflects the ages, needs and activities. Links are made to guidance on health and safety and risk assessment where appropriate.</p>	<p>B- The code covers many aspects of school life for example one-to-one working.</p> <p>It is made clear that the code applies to all activities that may take place off the academy premises.</p>
<p><b>6.6 The code make is clear that discriminatory, offensive, violent and inappropriate behaviour are unacceptable.</b></p>	<p>Code does not make this clear.</p>	<p>Code is clear and unequivocal on this. Breaks down what is meant by 'discriminatory' (e.g. 'racist', 'sexist', 'homophobic' etc.) and 'offensive' (e.g. 'humiliating', 'personal comments about appearance', 'sarcastic', 'inappropriate use of humour' etc.) It also refers</p>	<p>Code is clear and unequivocal on this. Breaks down what is meant by 'discriminatory' (e.g. 'racist', 'sexist', 'homophobic' etc.) and 'offensive' (e.g. 'humiliating', 'personal comments about appearance', 'sarcastic',</p>	<p>F- The code makes it clear that any form of discrimination is unacceptable and refers readers to equality and diversity policy as well as the anti-bullying policy</p> <p>The code is clear about favouritism and the receiving of gifts advising staff to declare the regular receiving of gifts</p>

		to favouritism and giving or receiving of gifts. It makes clear that if staff have concerns about a colleague they should be reported.	'inappropriate use of humour' etc.) It also refers to favouritism and giving or receiving of gifts. It makes clear that if staff have concerns about a colleague they should be reported. The process for reporting these concerns is detailed and links are made to the whistleblowing policy and the managing allegations procedures.	Consider including in more detail in this policy what is meant by discriminatory behaviour.
<b>6.7 Appropriate online behaviour using digital technology and mobile devices and social media is included.</b>	Code leaves out any reference to online behaviour or makes generic references.	Code refers to the use of all types of digital devices, apps and software, and explains its expectations for appropriate online behaviour.	Code refers to the use of all types of digital devices, apps and software, and explains its expectations for appropriate online behaviour. It clarifies staff responsibilities for their own behaviour and how to respond to online behaviour of pupils such as emails and friend requests.	F- The code of conduct clarifies that communicating with pupils via social media is not recommended and is prohibited if the purpose is to pursue a relationship.  Considering new forms of social media and the ever changing usage I would recommend creating a social media usage policy for staff.
<b>6.8 There is an agreed protocol for the delivery of remote learning or online/virtual teaching and contact with pupils</b>	The code does not include this aspect.	The code includes guidance on behaviour during periods of remote learning.	The code has been updated to reflect remote learning, live streaming or virtual classroom activities. This includes the use of school platforms to deliver online lessons, appropriate dress and backgrounds to be used in any live streaming and virtual lessons. Staff are made aware of the need to record any live streaming of lessons.	There is no reference to remote working in the code, however this is something for the academy to determine whether it is relevant.

<p>6.9 Promotes personal privacy and dignity, and ensures safe care for children and young people with specific and/or intimate care needs.</p>	<p>Code leaves out any reference to this or is intrusive.</p>	<p>Code refers to the need to respect personal privacy and dignity, ensuring that young people are supported in meeting their own physical care needs wherever this is possible and safe.</p>	<p>Code refers to the need to respect personal privacy and dignity, ensuring that young people are supported in meeting their own physical care needs wherever this is possible and safe, and that staff carrying out intimate care are trained appropriately. There may be a separate policy for intimate care, which should be referenced.</p>	<p>RI- There is no reference to intimate care needs in the policy.</p> <p>Consider linking the code to an intimate care policy</p>
<p>6.10 There is guidance on the use of restrictive physical intervention or use of reasonable force.</p>	<p>This is not included or guidance is not clear.</p>	<p>This is seen as part of a response which takes into account individual circumstances and context. There are links to a full policy where applicable.</p>	<p>This is seen as part of a response which takes into account individual circumstances and context. There are links to a full policy and risk assessment processes where applicable.</p>	<p>B- There is detailed and sensible guidance on physical contact with pupils.</p> <p>Consider linking to a separate use of reasonable force policy</p>
<p>6.11 The code makes specific reference to the 2003 Sexual Offences Act and the position of trust.</p>	<p>Not mentioned.</p>	<p>Is referenced specifically in the code.</p>	<p>Is referenced in the code specifically and the consequences of abuse of a position of trust are made clear.</p>	<p>F- The code references the concept of position of trust but doesn't specifically reference the Sexual Offences Act 2003</p>
<p>6.12 There is a clear process for what staff/volunteers should do if they consider there has been a breach of the code of conduct.</p>	<p>No reference made to what someone should do if they are concerned that the code has been breached.</p>	<p>There is a clear process for how staff/volunteers should report a breach of the code of conduct or if they have a concern about a colleague's behaviour in relation to the code.</p>	<p>There is a clear process for what staff/volunteers should do if they consider there has been a breach of the code of conduct and there is reference to associated processes i.e. performance management, disciplinary procedures, management of allegations and whistleblowing</p>	<p>RI- There is no reference made to what someone should do if they are concerned that the code has been breached.</p> <p>However, there is a comprehensive section on low level concerns and allegations against staff in the safeguarding policy.</p> <p>Consider linking to the safeguarding policy</p>

<p><b>6.13 Requirement to record breaches to code.</b></p>	<p>No requirement to record breaches.</p>	<p>The code includes information on how breaches will be recorded.</p>	<p>There is a requirement to record breaches. There is evidence that the code is reviewed in the light of breaches within the previous 12 months.</p>	<p><b>RI- There is no reference made to recording breaches of the code.</b></p> <p>However, there is a comprehensive section on recording low level concerns and allegations against staff in the safeguarding policy.</p> <p><b>Consider linking to the safeguarding policy</b></p>
<p><b>6.13 The code of conduct is regularly reviewed.</b></p>	<p>No requirement that the code is reviewed. Code does not have a date for last review or next one.</p>	<p>The date of the last/next reviews are given.</p>	<p>The date of the last/next reviews are given. It is clear who has the responsibility for reviewing the code.</p>	<p>B- Dates of previous and future reviews are included in the policy.</p>