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COVID-19: Interim *additional* arrangements for Child Protection and Safeguarding: Policy, Procedures & Guidance

**30 March 2020 (updated 16 April and
reviewed 11 January 2021)**

This is policy and guidance that applies Trust-wide
and should inform the required school-specific
interim additional safeguarding procedures

Date of Policy Approval:

Owner of Policy:

John Wm
Stephens, CEO

Authorised by:

Emergency
implementation
in response to
Government
guidance

Policy Review Date:

In response to
updates

Distribution:

**All staff,
workers,
governors and
trustees**

Context

From 20th March 2020, parents/carers were asked to keep their children at home, wherever possible, and for schools to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend. Schools and all childcare providers were also asked to provide care for a limited number of children - children who are vulnerable, and children whose parents/carers are critical to the COVID-19 response and cannot be safely cared for at home. **In January 2021 similar 'lockdown' restrictions were introduced leading to a review of this supplement.** This addition to the Bright Futures over-arching Safeguarding and Child Protection Policy sets out the arrangements specific to our responses during the Covid-19 emergency situation. We recognise that this is a changing situation and that the different contexts of each of our schools will mean some local variation in the specifics. This document sets out the overall expectations across the Trust. Each school will prepare their own, locally specific version that includes the key contacts etc.

The current situation potentially presents an increased risk to children and vulnerable adults. Organisations such as the NSPCC and The Children's Society have highlighted the potential risks for children whose homes are not safe places. Contacts to Childline have significantly increased **during lockdown periods.**

Incidents of **serious domestic violence and abuse** appear to be increasing. This is of particular concern as the usual means of detecting and escaping from domestic abuse are limited during the lockdown and households may be under increased pressure. The police and other partners are aware of the increased risk and have made more resources available to prevent and respond to this threat.

The arrangements set out here are *in addition* to the normal safeguarding and child protection policy. It is important that, as far as possible, we continue to adhere to the good practice set out in the full policy.

Key contacts

Every school should detail the key contacts for safeguarding. This may need to have some additions added to show deputies and also to include some out of hours or off site phone numbers.

All DSLs and Principals/Heads of School have the contact phone numbers for the Trust Safeguarding Lead, John Stephens, CEO.

Local contacts (e.g. the LADO or social care 'front door') may have changed the direct numbers given that people are working from home – check this and make sure it is accurately recorded.

Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who have a Child Protection Plan and those who are looked after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989. **The guidance on attendance in January 2021 includes a much wider group than was the case in March 2020 and this creates a potential problem of there being too many children on site than can be managed in a covid-secure way.** Those with an EHC plan **are not necessarily 'vulnerable'. They** will be risk-assessed in consultation with the parents/carers and other partners, to decide whether they need to continue to be offered a school or place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. **It is important that the rights and agency of parents/carers and students are respected and supported in the process of assessing risks.**

Many children and young people with EHC plans can safely remain at home. Indeed, for some, this may be the safest and most comfortable place for them. Eligibility for free school meals should not be the **single** determining factor in assessing vulnerability. Senior leaders, especially the Designated Safeguarding Lead

(and deputy) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support **for example**.

We will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent/carer does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and school name will explore the reasons for this directly with the parent/carer. Where parents/carers are concerned about the risk of the child contracting COVID19, school name or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England. We will encourage our vulnerable children and young people to attend school but even where it is judged this is not appropriate, we will keep in regular contact (daily for the most at risk).

Whilst 2021 guidance states that schools should not 'cap' the number of children able to attend on-site provision and includes amongst the 'vulnerable' those that cannot access remote learning, schools will need to balance the risks associated with virus transmission caused by multiple close contacts and ensuring good access to learning. The Chief Medical Officer emphasised on 11 January the need to control the spread of the virus and protect the NHS by reducing contacts to the minimum. Whilst there is evidence that supports the view that generally young people do not suffer serious illness as a result of the virus, there remains a risk to all their contacts if an outbreak occurs in schools. **The basics of infection control must be adhered to at all times.**

Attendance monitoring

Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance. Working with social care staff, we will agree with parents/carers whether children in need should be attending school. We will follow up on any pupil that we were expecting to attend who does not. We will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend. To support the above we will confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available. In all circumstances where a vulnerable child does not take up their place at school, or discontinues, we will notify their social worker.

Where we have large numbers of children deemed 'vulnerable' processes are in place to do regular checks with families by phone and all contacts are recorded.

Designated Safeguarding Lead

The original trust-wide guidance for partial opening of schools stated that the DSL or a named deputy on site would be the preferred model. As the school closures continue this may not be possible. In all cases, however, the people working on site need to know how to contact the DSL (or an appropriate) deputy at all times. When the DSL or an appropriate deputy is not on site, the person in overall charge of the provision for that day will assume day to day safeguarding responsibilities.

The DSL and deputy will continue to maintain good contact with children's social care and other partner agencies. Using remote access they will contribute to relevant multi-agency discussions such as strategy meetings and reviews.

Personal Education Plans for children who are looked after will need to be considered and a discussion held with heads of the local virtual schools to see what would be most useful in supporting children and young people.

Reporting a concern

The process of reporting concerns about a child or an adult are unchanged. Processes set out in the full policy apply. Where school closure arrangements present any barriers to the reporting of concerns **do not delay. If you are unable to access normal online reporting systems whilst working remotely, make a careful, thorough, factual note or the concerns. There is a format for this in the main policy if needed.** Emergencies need to be reported to the police in the same way as normal.

Safeguarding training and induction for staff and those involved in governance

Safeguarding training other than that which can be completed online will take place whilst there remains a threat of the COVID 19 virus. For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing school staff have had safeguarding training and have read part 1 of 'Keeping Children Safe in Education' (2019). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child. It is worth reminding staff of any additional risks associated with school closure.

Where new staff are recruited, or new volunteers enter school name, they will continue to be provided with a safeguarding induction. If staff are deployed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept DBS portability as long as the current employer confirms in writing that:

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual.

When new staff arrive, they will be given a copy of the receiving setting's safeguarding and child protection policy, confirmation of local processes and confirmation of DSL arrangements. **Where reference is made to 'staff' this includes all trainees and temporary appointments working in the schools.**

Safer recruitment/volunteers and movement of staff

During times of emergency measures there are people who seek to exploit any gaps or relaxation in procedures. **It is essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children.**

When recruiting new staff, we will continue to follow the relevant safer recruitment processes set out in our policies including, as appropriate, relevant sections of Keeping Children Safe in Education (2020) (KCSIE). Our Safer and Fair recruitment policy can be found on the Trust's website; pages 7 and 8 detail the pre-employment screening which is still required: [Safer and Fair Recruitment policy](#).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact. Where we are deploying volunteers, we will continue to follow the checking and risk assessment process as set out in KCSIE. **Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.** We will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. **Full details can be found from paragraph 183 – 188 of KCSIE (2020).** We will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 150 of KCSIE and the TRA's 'Teacher misconduct advice for

making a referral'. During the COVID-19 period all referrals should be made by emailing: Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the single central record (SCR) up to date as outlined in paragraphs **164** to **171** in KCSIE and in accordance with the process detailed on page 11 of the Bright Futures' 'Safer and Fair Recruitment' policy.

Online safety in schools

The increased use of online resources means that ESafety is more important than ever. All the usual policies governing safety online should be implemented at all times across all Trust sites. It may well also be timely to remind students of the potential for them to be exploited at this time. There are a large number of scams being enacted on various social media platforms, exploiting the fact that unscrupulous people know that children and young people are spending more time than ever accessing materials online

Whenever staff are interacting with children either face to face or by virtual means, they should continue to be alert for signs of safeguarding concerns. These should be reported in the usual manner.

Government guidance issued in 2021 states that a senior leader should be named as having overall responsibility for the quality of remote learning. DSLs will need to liaise with this person to ensure that all practice is safe and promotes the safeguarding of children and young people.

Online teaching and signposting to online materials/resources

Any teaching conducted virtually should adhere to the same high professional standards expected in all other contexts. We will need to ensure that any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Andrew Hall, safeguarding consultant, has offered the advice (below) for online lessons, especially if live webcams are used. As a point of principle, if there is no established custom and practice for using direct online (live) teaching, now may not a good time to start it. However, as the lockdown arrangements continue, it may be necessary to review arrangements for making best use of technology to keep in touch with students and maintain a good link. Safe ways to do that include provision for students to access approved online resources or to have links to resources that the school has pre-recorded (e.g. book reading at South Shore and Rushbrook, the 'Big Draw' at Stanley Grove, assemblies at AGGS etc)

Specific considerations if online (live):

- No 1:1s, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use approved platforms to communicate with pupils, noting that Teams/Skype and Zoom in particular have improved their security and password access arrangements.
- Staff should record, the length, time, date and attendance of any sessions held.

Any safeguarding concerns observed or highlighted during any communication with students must be recorded and reported following the usual systems.

Supporting children not in school

We are committed to ensuring the safety and wellbeing of all our children and young people. Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person. Details of this plan must be recorded on the school's systems, as should a record of contact have made. The communication plans can include; remote contact, phone contact or any approved 'doorstep' visit. Other individualised contact methods should be considered and recorded (e.g. 'Facetime').

We will work closely with all stakeholders and partner agencies to maximise the effectiveness of any communication plan. This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

We recognise that school is a protective factor for children and young people, and the current circumstances can affect the mental health of pupils and their parents/carers. Staff need to be aware of this in setting expectations of students' work where they are at home. Where bespoke support is provided for a child it will be recorded on the school's usual systems.

Supporting children in school

We will ensure that where we care for children of critical workers and vulnerable children on site, we will ensure appropriate support is in place for them. Where bespoke support is provided for a child it will be recorded on the school's usual systems. Our schools will continue to be a safe space for all children to attend and flourish. The person in charge will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate to maximise safety.

We will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19. Where a school has concerns about the impact of staff absence – such as the Designated Safeguarding Lead or first aiders – they will discuss the risk this presents with the trust Executive Team so that appropriate mitigation can be put in place.

Children attending schools or settings other than their own

As the lockdown arrangements continue it is possible that some children may be asked to use a shared provision in a school or setting other than the one they attend in normal times. For example, in Blackpool collaborative arrangements **were made in the first lockdown** for a town-wide provision covering weekends and Bank Holidays. When this happens, DSLs and senior leaders need to be content that adequate safeguarding arrangements are in place, including a system for the 'shared provision' to pass on any concerns to the school that the child normally attends. Any relevant safeguarding information should be securely shared with provisions that are looking after children from our schools ensuring that the sharing is: **necessary, proportionate, relevant, accurate, timely and secure**. A record should be kept of the reasons to share information, with whom it was shared and when.

Support for mental health and well-being

The significant societal changes that we are experiencing may have a negative impact on some people's mental and physical health and well-being. The Trust will publish some advice and guidance on support for well-being and mental health developed by colleagues in the Greater Manchester Mentally Healthy Schools Team and our own educational psychologists. These materials will be published on the Alliance for Learning website (link given below).

Peer on Peer Abuse (Child on child abuse)

We recognise that during the closure a revised process may be required for managing any report of such abuse and for supporting victims. Where a school receives a report of peer on peer abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within of the Safeguarding and Child

Protection Policy. The school will listen and work with the young person, parents/carers and any multiagency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded on the school's systems and appropriate referrals made.

Lateral Flow testing in Schools

Schools in the trust that deliver lateral flow tests will adhere strictly to the comprehensive guidance, risk assessments and training issued by the DfE/DHSC. Any use of volunteers in respect of this programme will be subject to the same recruitment and oversight of all other volunteers. The scope of their roles must be clearly defined as must arrangements for their supervision and training.

Some children who have suffered particular forms of abuse may find the physically invasive nature of lateral flow testing difficult, even if they are self-administering. It's important that staff and/or volunteers working on the testing are aware of the possibility of trauma related to physically invasive procedures.

Useful links

Government guidance: <https://www.gov.uk/coronavirus/education-and-childcare>

Safeguarding network advice on COVID-19 implications: <https://safeguarding.network/covid-19/>

NSPCC Home Page: [HERE](#)

Children's Commissioner website including COVID-19 advice: [COMMISSIONER](#)

Alliance for Learning useful resources: [TEACHING SCHOOL](#)

Bright Futures' Safe and Fairer Recruitment policy

[Safe-and-Fair-recruitment policy](#)