

School Safeguarding Audit 2018/2019

1. Purpose of this report

- 1.1. The purpose of this report is to inform the Learning and Improvement Subgroup of the key themes identified from the North Yorkshire Safeguarding Children Partnership's (NYSCP's) School Safeguarding Audit 2018/2019 across primary and secondary phases of education up to the age of 18.
- 1.2. The report will also provide the Partnership with assurance regarding the level of safeguarding arrangements within all schools, including maintained primary and secondary schools, special schools, academies and independent schools within North Yorkshire.

2. Background

- 2.1. The NYSCP undertook an audit of school safeguarding arrangements in 2016/2017 and highlighted a number of key themes, including:
 - Child Protection policies and procedures are in place in most schools
 - Improvement to the awareness of private fostering
 - Record keeping was an issue for a number of schools
 - E-Safety was generally found to be good with most schools maintaining e-safety high on the agenda, although a small number of schools reported that they did not have an acceptable use policy or appropriate safeguard controls in place
 - There were a slight decrease in schools reporting that it was applicable to have systems in place to monitor rates, patterns of and reasons for fixed-period and permanent exclusions
 - It was noted that schools reported that staff were generally trained appropriately but in a limited number of cases some schools reported they key roles such as the Designated Safeguard Lead (DSL) had not received all training required
- 2.2. An action plan was put in place to address the findings of the 2016/17 audit, with the next School Safeguarding Audit scheduled to take place during the 2018/2019 academic year.

3. Methodology

3.1. A Task and Finish Group was formed to review the School Safeguarding Audit issued by the NYSCP to schools in 2016/2017. The task group updated the School Safeguarding Audit Tool to take into account changes in Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2018 alongside other key legislation and statutory practice guidance. This group comprised of representatives from:

- North Yorkshire County Council Education and Skills
- Safeguarding Unit (CYPS)
- Inclusive Education Service
- Health and Safety
- Human Resources
- Safer Communities
- Early Years

3.2. A revised audit tool was agreed by the task group which examined eight key areas, these being:

- Safer Recruitment
- Management of Safeguarding and Actions Taken where there are Concerns about a Child
- Inclusion, Attendance and Anti-Bullying
- Managing Risk
- Early Years
- Learning Beyond the Classroom
- Premises Security
- Premises Health and Safety

3.3. Schools completed a self-assessment of their safeguarding arrangements using the audit tool which also incorporated evidence gathering which could be used by a school during inspections.

3.4. Due to the busy schedule for schools at the beginning of the academic year, it was agreed that the audit tool would be distributed to schools in November 2018. This was in keeping with the dates NYSCP previously circulated its Safeguarding Audit Tool to schools. Schools were requested to provide completed responses by 29 March 2019 to allow schools to robustly complete the audit and ensure this was approved through their governance processes.

4. Response to the Audit

4.1. The School Safeguarding Audit conducted in 2018/2019 had a response rate of 98.7% which is a higher response received in 2016/17 (just below 90%). The audit continued to receive a very good response from maintained schools (99.8%) and a significantly improved response from academies (96.8%) in comparison to 2016/17 (75.9%). There was a reduction in special schools response rate (90%) compared to 2016/17 (100%), but positively independent schools response rate was 100%, this increased by 13% from 2016/17. Please see Figure 1 below.

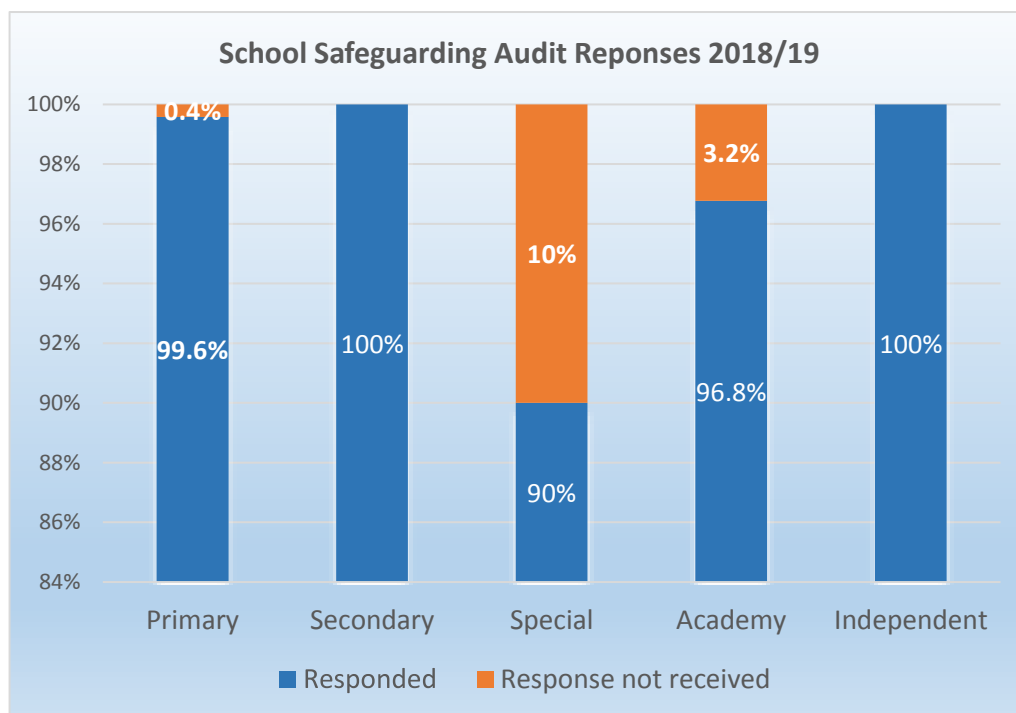


Figure 1 – School Safeguarding Audit Responses 2018/2019 (accurate as of September 2019)

4.2. 379¹ schools in North Yorkshire responded to the audit. However, of those respondents 9 schools submissions were inadmissible. These submissions therefore have not been included within the findings data. Those 9 schools have all since been contacted by NYSCP to inform them of their submission being excluded. A number of schools have advised they are making arrangements to resubmit by October Half-Term 2019.

Of those schools who have not provided a response to the audit (5 schools), one of those schools did not respond to the 2015/16 or 2016/17 school safeguarding audit cycle.

¹ Since this report was finalised in September 2019, there have been further submissions (4 in total) from schools. These submissions have been included in the response figures, but due to only receiving these submissions in September they have not been included within the findings data due to the need to complete the analysis of the data in a timely manner.

- 4.3. Since the submission deadline passed at the end of March 2019, NYSCP alongside NYCC Education & Skills have contacted those schools who have not responded to this cycle throughout the remaining months of the academic year. Communication has been made via direct letters, emails to Headteachers and Chair of Governors, and phone calls from NYSCP and NYCC School Improvement Advisors. The level of tenacity demonstrated in seeking an audit submission has in large contributed to the response rate of this audit cycle being the highest level achieved to date.

5. Compliance

- 5.1. Of the 366 schools² whose responses were used within the findings, the level of compliance with the requirements outlined in the audit tool has remained high, with all schools reporting that they were fully compliant with the majority of safeguarding controls.

On average, maintained primary, academy, and maintained special schools reported the highest level of compliance in their safeguarding arrangements in place at 87%; maintained secondary schools reported the lowest overall level of compliance with safeguarding controls being fully implemented at 83%.

- 5.2. Independent schools reported to have the highest number of action plans to implement safeguarding requirements at 6%, with Maintained Special schools reporting the lowest at 4%.
- 5.3. On average, academy schools reported the highest number of areas for development which have been identified where an action plan is not in place, however this figure was extremely low at 0.5%.
- 5.4. Across the sector, schools reporting previous unidentified safeguarding concerns before completing the audit was negligible (0.06% independent schools, 0.09% academy, 0.1% maintained special schools, 0.04% maintained primary schools) with maintained secondary schools reporting this was not the case for any safeguarding controls.
- 5.5. Maintained secondary schools reported the highest percentage of safeguarding controls not being applicable to their setting at 11.5%. This is to be expected however,

² Although 379 schools responded, 9 schools submissions were inadmissible and a further 4 schools submitted their audit tool too late (in September 2019) to be included within the data analysis.

given the Early Years section of the audit tool will not be a control secondary schools have arrangements in place for.

5.6. For a further breakdown please see Figure 2 below:

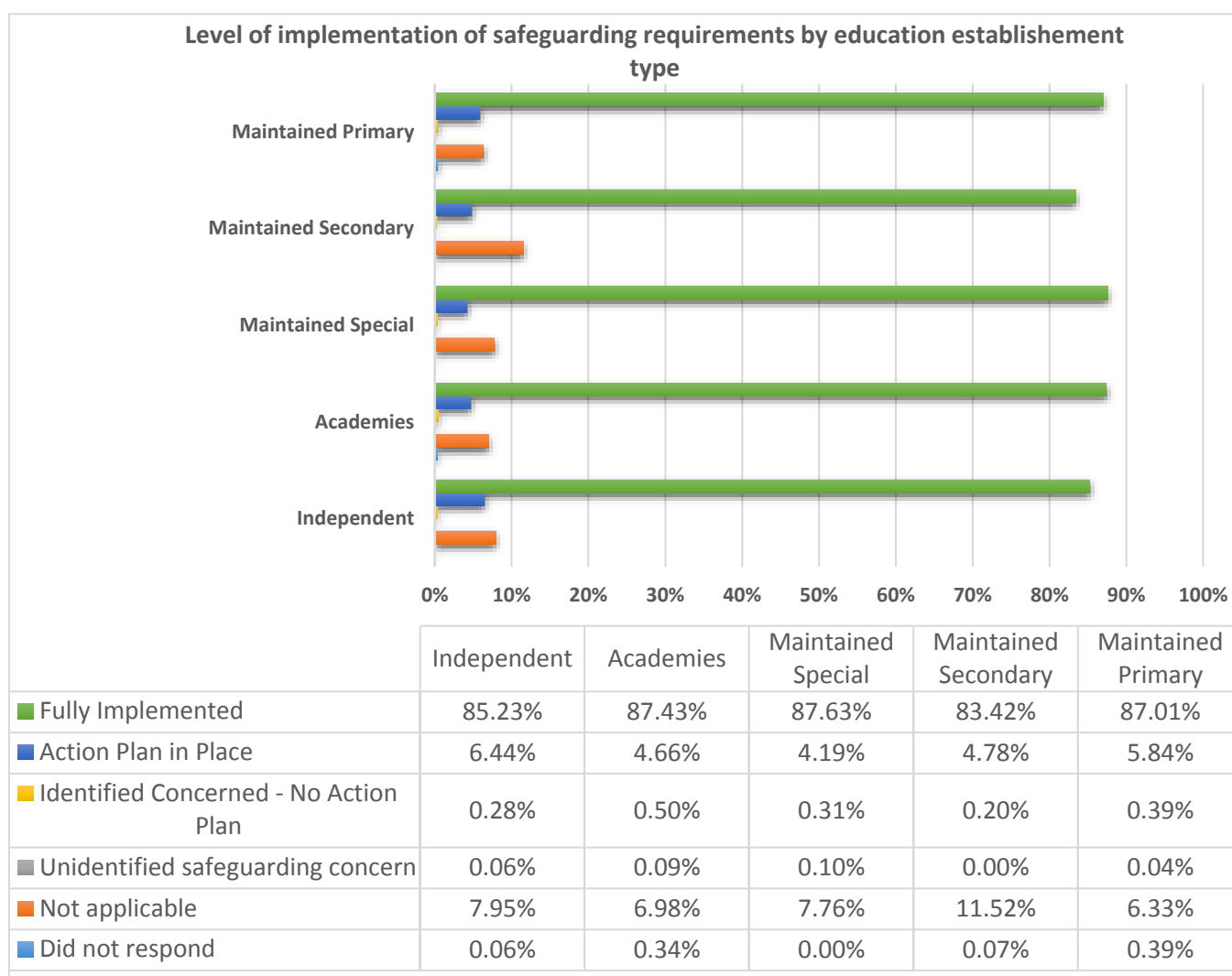


Figure 2 – Level of implementation of safeguarding requirements by education type (accurate as of September 2019)

6. Maintained Primary Schools

6.1. The number of maintained primary schools which provided acceptable responses to the audit was 231. This figure when compared to the 2016/17 of 285, on first glance is significantly lower however since the last audit cycle in 2016/17 a high proportion of maintained primary schools have become acadamised.

6.2. The level of reported compliance with the requirements of the audit across maintained primary schools was high, with most schools reporting that they had arrangements in place or were implementing plans to address requirements. Of the 231 maintained primary schools, 217 schools (94%) reported that they had child protection policies and procedures in place and provided these to staff on induction. The remaining 14

schools (6%) identified this control as having an action plan in place to address this requirement. Positively, no schools reported that this control was not applicable.

6.3. It is of significance to note that generally primary schools did not have many identified risks without actions in place to address or previously unidentified risks. Where this occurred it was generally limited to one or two schools rather than being a widespread theme between schools.

6.4. Most primary schools (97%) reported they have a senior lead who takes leadership responsibility for safeguarding arrangements. Of the remaining 7 schools, 6 identified this control as having an action plan in place and 1 school reported this as an identified concern with no action plan in place.

6.5. The large majority of primary schools have continued to improve the arrangements they have in place for addressing online safety concerns and incidents reported by pupils, staff or parents, as well as arrangements for logging incidents, with no primary schools reporting this control was not applicable.

191 schools (83%) reported they have a staff behaviour code in place which includes acceptable use of technology, staff/pupil relationships and communications including the use of social media. The remaining 40 schools (17%) identified this control as having an action plan in place to address this requirement.

Given the increasing role of the internet in child protection cases, all schools should continue to develop their arrangements in place to address the safety of children online, which continues to be an emerging and challenging need to meet.

6.6. A number of schools reported they were undertaking actions to improve safeguarding arrangements, with the key areas being:

- Ensuring staff and volunteers read relevant documents and record keeping for ensuring that this is recorded, and;
- Providing training and awareness

6.7. Arrangements in relation to schools having robust procedures to manage emergency situations should they arise has been identified as a potential weakness. Only 124 primary schools (54%) reported they have this control fully implemented, with the remaining 104 schools either reporting they had an action plan in place to address this requirement (38.5%) or this control was identified with no action plan in place (6%). One school (0.5%) reported that this control was not applicable to them.

6.8. Arrangements for Looked After Children (LAC) and previously LAC is also a potential area for development for schools. 39 primary schools (17%) identified ensuring staff have the skills and knowledge to keep LAC and previously LAC safe as an action to

address. In addition, 2 schools reported this control as an identified concern with no plan in place to address, two schools recognised the control as previously unidentified, and one school did not provide an answer.

12 schools reported that having arrangements in place for LAC and previously LAC is not applicable to them as they currently do not have any LAC on roll. However schools are reminded as in accordance with Keeping Children Safe in Education (2019) the needs of individual students does not impact on requirements placed on schools to have arrangements in place. All schools have a legal duty to have LAC and previously LAC arrangements present at the point a child is identified not retrospectively; because a school does not presently have any children identified as being a looked after child or a previously looked after child does not negate the requirement to have relevant procedures in place for when a looked after child is identified.

- 6.9. It is difficult to ascertain whether there has been an improvement made in primary schools having arrangements in place in relation to Private Fostering. This has been an area of potential weakness during previous audit cycles, but Private Fostering as a requirement on the 2018/19 audit tool was included alongside additional specific safeguarding issues. Therefore the analysis is unable to extrapolate compliance accurately for Private Fostering specifically. It is worth noting, that Private Fostering remains under reported nationally and in North Yorkshire. Via the North Yorkshire Private Fostering Strategic and Operational Group work is being developed to address this.
- 6.10. Another area identified in the 2016/2017 audit was regarding record keeping. Primary schools maintain a number of different records linked to safeguarding which includes but is not limited to safer recruitment, complaints, allegations, etc. This audit cycle received a mixed response from schools in terms of the positive developments since 2016/17 but also minor issues with record keeping, these included:
- In 2016/17, 26 (8%) primary schools reported it was not applicable for the Single Central Record (SCR) to record evidence of permission to work for those who are not nationals of an EEA country. Positively, during this audit cycle no schools reported this control was not applicable to them
 - In 2016/17, 7 (2%) schools reporting that it was not applicable to maintain a welfare file for all children known to CSC, LAC, subject to CAF or for whom there are welfare concerns. During this audit cycle, 14 schools (6%) reported this control was not applicable to them and 2 schools did not provide an answer
 - In 2016/17, 8 (2.6%) schools reported it was not applicable for them to keep a list of referrals to the Designated Safeguarding Lead (DSL) and those that were

subsequently referred to Children's Social Care along with brief details of the resolution. During this audit cycle, 7 schools (3%) reported that this control was not applicable to them with 1 school not providing an answer

- 6.11. It was noted that during this audit cycle, as with previous audit cycles, 3 schools still reported that it was not applicable for them to have appropriate reporting and referral processes in place for pupils at risk of radicalisation and extremism. Keeping Children Safe in Education (2019) states "Protecting children from the risk of radicalisation should be seen as part of schools' and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse." From 1 July 2015 schools have been subject to a duty under Section 26 of the Counter-Terrorism and Security Act 2015 and governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Partnership.

Furthermore, North Yorkshire Community Safety Partnership published specific guidance on Working with Individuals Vulnerable to Extremism in Education Settings in Schools, Education Settings and Colleges in 2018. The guidance stipulates that schools settings and colleges need to ensure that Prevent and Channel processes are embedded within their organisations and within the day to day safeguarding practice of staff.

- 6.12. Where a child is deregistered from a school, the school should routinely inform North Yorkshire County Council when the school or parent deregisters a child. In response to this control, the majority of schools reported they are fully compliant in meeting this requirement (93%). However, 13 primary schools (5.6%) reported this was not applicable for their school. Whenever a child is deregistered from a school there is a risk that the child may become lost to the local authority and invisible to services. This can place the child at risk, especially if there are concerns regarding the child's safety and welfare.
- 6.13. In summary, primary schools reported the following compliance in relation to the Early Years section of the audit tool:
- 86% schools reported they have policies and procedures in place as outlined in the EYFS Statutory Framework. 24 schools (10%) have identified actions in place to address this requirement, 2 schools recognised this control as a concern without currently having a plan in place, and 6 schools reported this requirement as not being applicable to them;
 - The majority of schools reported they have appropriate policies, facilities and staff in place for delivering intimate personal care. 16 schools identified this control needed action, 6 schools recognised this as a concern without currently having

an identified action in place, and 10 schools responded to this control as not being applicable;

- Where applicable, the majority of schools reported that they ensure that children are adequately supervised and that staffing ratios are met for children under 3 years. 4 schools reported this control as having an identified action in place to address this requirement. 47 schools noted that this control was not applicable to them and given that some primary schools work with children no younger than four years old this is proportionate;
- 89.6% of schools reported that all children in the EYFS are allocated a Key Person and 86% noted that the Key Person system is embedded into practice;
- The strong majority of schools have a policy in place that sets out the arrangements for the taking, storing and use of images of children. 15 schools reported that this requirement as having an action in place to address and 4 schools stated that this control was not applicable to them

6.14. The Department for Education (DfE) published statutory Relationship education, relationships and sex education (RSE) guidance. The new curriculum will be mandatory from 2020. Schools are encouraged by the DfE to adopt the new curriculum from September 2019. Maintained primary schools reported that 69% (160 schools) have an up to date RSE policy in place for pupils, 59 schools (25.5%) have an action in place to address this control, 10 schools (4%) identified this control as a concern without currently having an action in place to address this, 1 school stated this control was not applicable and 1 school did not provided an answer.

6.15. Finally, the majority of primary schools (98%) reported that staff receive appropriate and relevant continued professional development to enable them to teach age appropriate and differentiated aspects of safeguarding with confidence. This is also the case with maintained secondary, academy, independent and special schools who all reported this requirement was either fully implemented or identified actions to address. Unlike other educational settings however, there were 4 primary schools who reported this control as a concern without an action place to address this, with 1 additional primary school not providing an answer.

7. Maintained Secondary Schools

7.1. The level of response from maintained secondary schools was 100% (28 schools), this was an increase in the number which responded to the audit in comparison to 2016/17, increasing from 91%.

- 7.2. Again, it is of significance to note that generally secondary schools did not have many identified risks without actions in place to address or previously unidentified risks.
- 7.3. This audit cycle demonstrated there have been positive strides made by maintained secondary schools in relation to Safer Recruitment since 2016/17. Much like primary schools there was an improvement regarding the Single Central Record and the need to record evidence of permission to work for those who are not nationals of the EEA. 27 schools reported this control as being fully implemented, whilst the 1 remaining school identified an action in place to address this requirement. No schools noted this control as being not applicable, this is a stark improvement in comparison to 2016/17 where 13 schools (38%) reported that this was not applicable.
- 7.4. To a lesser extent than primary schools but still a potential area of weakness, is secondary schools arrangements in relation to having robust procedures to manage emergency situations should they arise. 20 schools (71%) reported they have this control fully implemented, with the remaining 8 schools reporting they had an action plan in place to address this requirement (29%).
- 7.5. A recurring theme appearing across this audit cycle are schools arrangements for Looked After Children (LAC) and previously LAC as a potential area of weakness. 5 secondary schools (18%) identified this control as needing action to address this requirement.
- 7.6. There were a number of different schools which did not have certain safeguarding requirements in place, although these were limited to single schools rather than being widespread concerns. Themes included:
- Staff being aware of and acting appropriately in respect of specific safeguarding issues, including children missing from education, child exploitation, domestic abuse, preventing radicalisation, private fostering, prevent duty, peer on peer abuse. 3 secondary schools (11%) identified this control as requiring action to address;
 - 5 schools (18%) have identified an action to address having an up to date Relationships and Sex Education (RSE) policy in place ahead of the new mandatory RSE curriculum due in September 2020;
 - Having appropriate safeguarding arrangements for pupils undertaking work experience placements and appropriate checks that any alternative providers have appropriate safeguards in place
- 7.7. Based on the nature of the requirements, all schools where applicable should have in place arrangements for each of the above requirements, regardless of whether they have any children or young people which presently meet the criteria of those

requirements. This is to ensure that where these situations arise, schools can respond in an agreed and consistent manner.

8. Maintained Special Schools

8.1. The response rate for special schools decreased from the 2016/2017 audit of 100% to 90% during this cycle (1 school has not responded).

8.2. Positively, all 9 schools reported they have fully implemented safeguarding requirements where in 2016/17 they had action plans in place to address those controls.

All 9 schools reported they have clear leadership and accountable structures in place to meet the schools statutory duties to prevent radicalisation and extremism, with the same number of schools reporting they are fully compliant in their responsibilities of online safety for staff and parents where a child or young person has special educational needs.

8.3. 7 schools (78%) reported that they carry out reasonable checks for example for links with extremism and assess what will be appropriate supervision of all visitors who are intending to work with children. 1 school reported they had an action in place to address the need to carry out checks and 1 school noted this requirement as not being applicable.

8.4. Pleasingly, all 9 schools reported there are structures in place to meet schools statutory responsibilities to prevent radicalisation and extremism, and appropriate referral processes in place for pupils at risk of radicalisation and extremism. Given that it is recognised young people with special educational needs can be at an increased risk of radicalisation and extremism it is reassuring all schools have reported compliance in respect of this control.

8.5. In line with primary and secondary schools, special schools also have a potential weakness when it comes to arrangements for Looked After Children (LAC) or previously LAC. 5 schools (55.5%) reported that their respective governing body ensures that staff have the skills, knowledge and understanding to keep LAC and previously LAC safe, and 3 schools (33%) reported they had an action in place to address this requirement, whilst 1 school identified this control as a previously unidentified concern.

8.6. It was noted that during the 2016/2017 audit, special schools reported a number of activities to develop their safeguarding arrangements. A number of these action plans have since been completed and this has been reflected in responses from schools in 2018/2019. In much the same way as with primary and secondary schools, there

were safeguarding requirements that were reported as being “not applicable” where this should not be the case, but this was in isolated cases. These included:

- Record keeping activities such as the checking of freelance staff, recording evidence of permission to work for non-EEA nationals, monitoring rates, patterns and reasons for exclusions and reasons for deregistering a child;
- Ensuring that in the event of needing to exclude a child, the child’s is always kept safe and is supervised on school premises until they have been collected by a parent/carer;
- Having appropriate facilities and staff with identified responsibilities for delivering intimate personal care to pupils where required

8.7. 6 schools (67%) reported that there is a senior lead who takes leadership responsibility for safeguarding arrangements, 2 schools (22%) identified this as an action in place to address this control, and 1 school (11%) identified this as a concern without currently having an action in place to address this requirement.

8.8. 7 schools (78%) reported that they have an up to date Relationships and Sex Education (statutory policy), substance misuse policy and a smoke free policy for pupils in place. 2 schools (22%) reported that they have an action in place to address this requirement.

9. Academy Schools

9.1. Responses from academies has improved significantly during this cycle to 96.8% (90 schools). However of those submissions, 8 responses were ineligible and as such the findings are based on the 82 acceptable submissions. The improvement in the response rate from academies is particularly pleasing given the increase in schools who have been acadamised since 2016/17. 3 academies have yet to respond to the audit request.

9.2. As with maintained schools, safeguarding arrangements were generally addressed and where there were requirements which were reported as a concern without an action plan, previously unidentified or not applicable were minimal and in isolation rather than being systemic.

9.3. Some safeguarding concerns were evident from schools reporting that certain arrangements are reported as not applicable as opposed to being unidentified or addressed risks. As with other educational types, there was no specific wide spread concerns regarding particular requirements within academies with issues only relating to individual schools; There were some themes shared with maintained schools such as a potential area of weakness when it comes to arrangements for

Looked After Children (LAC) or previously LAC and a school's Senior Leadership Team having robust procedures in place to manage emergency situations.

9.4. Much like maintained schools there was a significant improvement regarding the Single Central Record and the need to record evidence of permission to work for those who are not nationals of the EEA. 74 schools (91%) reported this control as being fully implemented, 6 schools identified an action in place to address this requirement, whilst 1 school noted this requirement as a concern without currently having an action in place. No schools reported this control as being not applicable, which as with maintained schools is a significant improvement since 2016/17.

9.5. Individual academies (not the same schools) reported throughout the audit at different stages that it was not applicable, these included:

- For staff to be fully informed and aware of the circumstances they must information the school of any police action against them, upon and during the course of their employment (2 schools);
- For school to carry out reasonable checks, for example for links with extremism, on, and assessing the level of supervision of all visitors who are intending to work with children and/or staff or to address assemblies (2 schools);
- For staff to be aware of and act appropriately in respect of specific safeguarding issues, including children missing from education, child exploitation, domestic abuse, preventing radicalisation, private fostering, prevent duty, peer on peer abuse (1 school);
- For school to have an up to date Relationships and Sex Education, substance misuse policy and a smoke free policy for pupils in place (1 school);
- For school to maintain a welfare file for all children known to social care, is a Looked After Child (LAC), or subject to a Common Assessment Framework or for whom there are welfare concerns (1 school)

10. Independent Schools

10.1. Responses from independent schools for this audit cycle had a 100% return rate (17 schools). This is a significant stride forwards and is in part due to the continued work of the NYSCP Business Unit in developing relationships with schools through forums such as the NYSCP Education Focus Group.

10.2. As with other types of educational establishments, some requirements were reported as being not applicable where this would have not been expected to be the case.

10.3. The positive trajectory of improved compliance in relation to the Single Central Record was also apparent for independent schools, with no schools reporting this was not an applicable requirement for them.

- 10.4. 14 schools (82%) reported that all policies and procedures of part of Keeping Children Safe in Education have been provided to as part of staff induction and the Head or Principal ensures that policies and procedures are followed by all. 3 schools (18%) reported that they had actions in place to address this requirement.
- 10.5. Only 8 independent schools (47%) reported they have fully implemented arrangements for Looked After Children (LAC) and previously LAC in place. 2 schools identified actions to address this control, 1 school reported this requirement as a concern without currently having an action in place to address this and 6 schools noted that this control was not applicable to their setting. Independent schools, just like maintained and academy schools have a statutory requirement to ensure arrangements are in place for LAC and previously LAC, whether or not they currently have LAC at their school is redundant, the arrangements must be in place.
- 10.6. A small number of independent schools reported some aspects of internet safety as not being applicable during the 2016/17 audit. It is pleasing to report that all independent schools reported arrangements for internet safety either as fully implemented or identified actions to put in place to address the various controls. These related to ensuring children are taught about online safety as part of a broad and balanced curriculum, staff and volunteers undergo online safety training, and ensuring appropriate filters and monitoring systems are in place to safeguard children from harmful and inappropriate online material.
- 10.7. A theme which was present in 2016/17 and was evident during this audit cycle was in relation to e-safety was independent schools not using the Local Authority when the school report hate crime incidents, bullying harassment or extremist behaviour with 3 independent schools reporting this as not being applicable. Although this has decreased from 6 schools in 2016/17, it is important that independent schools ensure that they notify the Local Authority where a child meets the criteria for help and support from NYCC Children & Families Service or where the child has or is likely to suffer significant harm and requires support from Children's Social Care.
- 10.8. One school reported that it does not routinely inform the Local Authority when the school/parents de-register a child from the school. By not informing the Local Authority that a child has been de-registered there is a risk that a child may become invisible to services and this may place the child at risk.
- 10.9. It was of concern that 1 independent school identified that it was not applicable to have staff who lead educational visits, outdoor learning, or adventurous activities to be in possession of appropriate qualifications and/or evidence of competence recorded as required by the schools procedures.

- 10.10. As a final area of development across those schools which reported that training arrangements were not in place or not applicable, the statutory guidance for schools, Keeping Children Safe in Education 2019 outlines the training requirements for all staff and schools should seek to follow this guidance.

11. Conclusions

- 11.1. The level of responses to this audit has been the strongest to date, with a significant increase in the number of schools submitting a return. This audit cycle, also saw a number of those handful of schools who have not responded to previous cycles respond to this one. There does remain a small number of individual schools (14 schools overall) which have either failed to provide a response (4 schools) to the audit despite several requests from NYSCP Business Unit and NYCC Education & Skills or provided an inadmissible submission (9 schools). In this regard NYSCP cannot be assured of the safeguarding arrangements within these schools. The Learning and Improvement Subgroup needs to identify a strategy for obtaining the information from those 14 schools and if they continue to ignore request for information, whether concerns regarding these schools should be reported to regulators.
- 11.2. Based on the response to the audit, the overall safeguarding arrangements is good. As would be expected there are areas where schools are continuing to develop their safeguarding arrangements, but in the majority of cases action plans are in place where requirements are not yet fully implemented.
- 11.3. Based on the level of responses by educational establishments, maintained secondary schools reported the lowest overall level of compliance with the safeguarding requirements outlined in the audit tool. It was of note also that maintained secondary schools were the only educational establishments not to report any unidentified risks and reported the highest level of safeguarding controls as being “not applicable”. Perhaps this is to be expected given maintained secondary schools will not have arrangements in place for early years requirements. Academies and maintained primary schools had the lowest level of safeguarding controls as being “not applicable”, suggesting these establishments understand what is required compared to other settings. Given the requirements on schools to review all of their policies, procedures, practices and processes as part of the process to convert to an academy, this would also support this hypotheses in relation to Academy settings.
- 11.4. It was of concern that across all educational establishment types, some schools, albeit in small numbers, reported that key safeguarding controls were not applicable and these concerns should be addressed through the respective governance arrangements within each educational establishment. Also, some educational establishments have identified unrecognised risks on a number of different issues

and these should likewise be addressed through the respective governance arrangements.

- 11.5. General record keeping, particularly the requirement in relation to Single Central Record has seen improved compliance since 2016/17, although particular controls in instances again have been identified as an issue across all schools. There appears to remain some concern that a limited number of schools did not keep a register of cases escalated to the Designated Safeguarding Lead which would indicate that these schools could not appropriately monitor concerns or patterns of behaviour. Further, a minority schools reported that it was not applicable to maintain a welfare file for all children known to CSC, LAC, in receipt of Early Help support or for whom there are welfare concerns, again raising questions as to how those schools monitor progress, or concerns and patterns of behaviour.
- 11.6. It is important for schools to continue to recognise the importance of appropriate record keeping to ensure that school governors/proprietors can be assured that safeguarding concerns have been addressed and there is evidence to demonstrate and measure this.
- 11.7. A cross-cutting theme for all education establishments was the potential area of weakness when it comes to Senior Leadership Teams having robust procedures in place to manage emergency situations. Across each education establishment, this safeguarding control sought the least responses of the control being fully implemented and the most concerns without a current action plan being in place and previously unidentified concerns.
- 11.8. In the 2016/2017 audit private fostering was identified as a key theme with schools reporting it was not applicable to have in place arrangements for informing the Local Authority of Private Fostering arrangements. The NYSCP has undertaken several campaigns to raise the profile of private fostering which is nationally recognised as an area that is underreported and is continuing to improve schools awareness of Private Fostering, through future campaigns alongside NYCC Children & Families Service. It is important to note that private fostering was not presented as a standalone requirement on the 2018/19 audit tool, rather it was included amongst a number of additional safeguarding controls schools are required to have in place. Therefore having Private Fostering as a standalone requirement would have provided a more accurate illustration as to how schools have progressed since the 2016/17 audit cycle.
- 11.9. Similarly to the issues in recognition of Private Fostering in previous audit cycles, schools responses to having arrangements in place for Looked After Children (LAC) and previously LAC was an area in which did not receive the level of compliance that

would be expected. Across each establishment, barring maintained secondary schools, there were a number of schools who either reported they did not have an action in place to address the requirement (6 schools), the control was previously unidentified (4 schools), or noted to be not applicable (21 schools).

- 11.10. E-safety controls are well addressed in many schools and this is testament to the work NYCC Education & Skills has carried out since the 2016/17 audit cycle. There does still remain areas for development for some schools, most notably in independent schools to ensure they report incidents which take place via technology such as hate crime, bullying, harassment or extremist behaviour are reported to the Local Authority.
- 11.11. It is pleasing to report that most schools either have Relationships and Sex Education policy fully implemented or have identified actions in place to address this ahead the new curriculum being mandatory for 2020. Schools are being encouraged to adopt the new curriculum from September 2019. However 12 maintained primary schools and 3 academies (2 primary and 1 secondary academies) either reported this control as a concern without an action in place to address (10 schools), as a previously unidentified concern (2 schools), not applicable (1 school), or did not provide an answer (1 school).

12. Recommendations

- 12.1. It is recommended that the Learning and Improvement Subgroup accepts this report and considers the following recommendations:
1. All schools should continue to develop their safeguarding arrangements, implementing actions where they have been identified and where unidentified risks have been recognised, action plans to address these concerns should be agreed in accordance with the establishment's governance arrangements
 2. Schools should be mindful of the thematic findings of this report, specifically those findings which are attributed to their educational establishment type and use these findings as part of reflecting upon their own school's safeguarding arrangements
 3. Where applicable schools should take urgent action to address the absence of having robust procedures in place to manage emergency situations. Guidance can be sought in relation to this requirement in the NYSCP School Sample Safeguarding Policy 2019/20
 4. Those schools who reported as not keeping a register of cases escalated to the DSL and/or maintaining a welfare file for children known to CSC, LAC in receipt of Early Help support should be reminded by the Local Authority of their statutory

- requirement to have arrangements in place whether they have children on roll who are known to services or not
5. Similarly, schools should be reminded by the Local Authority of their statutory duty in having arrangements in place for Looked After Children (LAC) and previously LAC. Should a school not currently have a child on roll who is LAC or previously LAC, the arrangements still need to be in place
 6. All schools should continue to ensure that their Designated Safeguarding Leads and Headteachers have completed appropriate training in accordance with Keeping Children Safe in Education (2019) and as outlined in the NYSCP School Sample Safeguarding Policy 2019/20
 7. The NYSCP should identify how it will obtain assurance of the safeguarding arrangements from those schools which have failed to respond to two school safeguarding audits
 8. The NYSCP should continue to undertake audits of the Safeguarding Arrangements in schools on a biennial basis unless there are any significant changes to legislation or statutory guidance which pertains to keeping children safe in educational establishments
 9. Private Fostering should be presented as a standalone safeguarding control in the 2020/21 audit tool
 10. The NYSCP audit tool should be reviewed and updated taking into account the feedback received from schools who were asked after completing the exercise, to complete a short survey based on their experiences of the audit. The school audit template should continue to only offer the option of “not applicable” to those requirements which may not be applicable to a school, i.e. safeguards to schools with shared access or early years’ requirements not applicable to all schools
 11. NYSCP should produce an accessible version of this report in the form a supplementary presentation which can disseminate the findings of the report across educational forums and networks

Jonathan Giordano
NYSCP Policy & Development Officer
November 2019