

By email to: [Safeguarding.SCHOOLS@education.gov.uk](mailto:Safeguarding.SCHOOLS@education.gov.uk)

Wednesday 9 March 2022

## Keeping children safe in education consultation response

1. The Association of Directors of Children's Services (ADCS) is the professional leadership association representing directors of children's services and their senior management teams in local authorities across England. ADCS welcomes the opportunity to comment on the Department for Education's (DfE) consultation on updates to its 'Keeping children safe in education' (KCSIE) guidance.
2. Overall, the changes to KCSIE are reasonable, however, there points which could helpfully be clarified in the final document. ADCS welcomes the application of this guidance to all staff which makes reference to supply staff, volunteers and contractors, however, ADCS would welcome greater clarity on all staff that this guidance applies to via the addition of a bullet point list. A short, easy-to-read executive summary of the first section of this important guidance for the wider workforce may also be helpful to include here.
3. The additions made in paragraph 81 setting out that all governors and trustees should receive appropriate safeguarding and child protection training is a welcome addition. It is important that governors are able to provide effective challenge to help hold school leaders to account and ensure that schools are safe places to learn. The Chair of Governors will likely be a consistent presence when other senior leaders in a school or college may change. However, the training they require may need to be tailored to fit their role and this should be reflected in guidance.
4. The strengthening of the guidance to promote a whole school approach to safeguarding is welcome. It is important that greater prominence has been given to the role of designated safeguarding lead (DSL) in light of the conclusion of the Children in Need (CiN) review. These children and young people often have poorer educational outcomes and while raising aspirations for this cohort is welcome, support must be also be focused on addressing their wider needs through the use of early help. ADCS Safeguarding Pressures research shows how poverty is a significant determinant of presenting factors such as, for example, parental mental ill health, domestic abuse, parental substance misuse and child neglect. More needs to be done to offer parents and carers early help and support to increase their capacity to meet the needs, both social and educational, of their children. It would be helpful if there was a more systematic focus on supporting parents and carers to create a positive home learning environment via access to high quality early education in the early years. *The Children Acts* of 1989 and 2004 aimed to improve services for children by promoting early help, however, myriad changes to legislation and policy have occurred over the last decade which have impacted on this.
5. Tailored interventions to support classroom learning may be required to meet the needs of individual children and young people experiencing vulnerability, however, given the size of the cohort it would be beneficial to take a more holistic approach to improving

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outcomes. ADCS is concerned that the growth of 'zero tolerance' behaviour policies in schools and an emphasis on 'expulsions' does not serve children who experience vulnerabilities. However, in the context of reduced funding and an accountability system that prioritises academic attainment, the stakes are high for school leaders who wish to adopt inclusive approaches. Schools may decide that in order to adequately meet the needs of this cohort more than one DSL will be required. Where this is the case, schools should have access to the necessary funding to adequately train sufficient staff.

6. ADCS welcomes the greater prominence given to the section on online safety in order to encourage schools and colleges to consider it as part of their whole school approach to safeguarding. Whilst links to help schools keep parents and children who are learning remotely safe are welcome, ADCS encourages the government to progress as soon as possible with an online education accreditation scheme which it consulted on in 2019. Given the research conducted by ADCS into the increased number of children electively home educating since September 2020, it is important that the Department is alert to any increase in the number of online schools that parents may use to supplement their home education experience.
7. ADCS broadly agrees with the decision to incorporate the standalone sexual violence and sexual harassment between children in schools and colleges advice into KCSIE. As was highlighted in Ofsted's review into sexual abuse in schools and colleges, child-on-child sexual violence and sexual harassment must be given prominence in education settings.
8. As outlined in KCSIE guidance, the impact of living with domestic abuse can have wide ranging impacts on children and young people. Teaching children about respect, tolerance and equality from an early age is vital; education is a powerful tool to raise awareness of abuse and to help children and young people to understand what healthy relationships look like, thus contributing to both preventative and protective aims. The *Children and Social Work Act 2017* placed relationships, sex and health education on a statutory footing, with a full rollout across all schools earmarked for the previous academic year which was initially delayed due to the pandemic. It is important that the government take this opportunity to further strengthen and embed these important life lessons via a 'whole school approach' and the provision of additional staff training, to ensure quality and consistency of access across all schools.
9. With regards to staff training in paragraphs 123 - 127, the guidance does not clearly state whether supply teachers and contractors, including facilities management staff, working on the school site on a regular basis are included in the safeguarding and child protection training for 'all staff' upon induction. Clearly, they should be but this is not yet sufficiently clear in the text.
10. If you have any queries or comments about the Association's consultation response, please contact Matt Cunningham, ADCS Policy Officer via [matt.cunningham@adcs.org.uk](mailto:matt.cunningham@adcs.org.uk) in the first instance