

Tuesday 6 February 2018

By email to: Safeguarding.SCHOOLS@education.gov.uk

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 are a handful of points which could helpfully be clarified in the final document. ADCS welcomes the application of this guidance to all staff, presumably this includes maintenance and catering staff, as well as teachers and senior managers, if so, this should be clarified 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 additional detail provided in paragraph 17 about children who may potentially benefit from early help and support services is likely to be helpful to school staff and is a welcome addition.
4. Changes to paragraphs 22 - 35 dealing with concerns about a child's safety or wellbeing have improved the clarity of this section. Whilst it is true that schools have a crucial role to play in terms of identifying children and young people who may benefit from the intervention and/or the support of children's social care, the strength of the relationship with learners and their families can make schools well placed to offer some initial advice and support. The addition of some examples of pastoral support and early help would be useful here.
5. ADCS supports the suggestion (paragraph 55) that schools should hold more than one emergency contact number for each child as recommended in previous serious case reviews. We also welcome the clarification around the importance of individual schools having localised child protection strategies, particularly those of whom are part of a wider chain or an overarching trust operating on a larger footprint.
6. With regards to the section on multiagency safeguarding arrangements (paragraphs 64 – 70), whilst ADCS members believe it is a missed opportunity not to name schools as equal partners alongside local authorities, the police and health in the arrangements that will replace local safeguarding children's boards from 2019 onwards, it would be helpful if the requirement for schools to be proactively engaged with their local safeguarding partnership was clearly articulated here in KCSIE. A similar suggestion was put forward by the Association in response to the recent consultation on updates to the statutory '*Working together to safeguard children*' guidance.
7. With regards to paragraphs 74 and 75, the guidance does not clearly state whether supply teachers and contractors, including facilities management staff, working on the

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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.

8. A series of small but helpful clarifications and links to other sources of information and advice about sexual harassment, modern slavery and county lines, for example, are welcome as is the inclusion of some further detail about the dangers of grooming and exploitation via the internet and peer-on-peer abuse. ADCS would support the latter having a higher profile in the updated version of KCSIE, possibly as a standalone section.
9. ADCS welcomes the emphasis placed on proportionate use of restraint for learners with special educational needs and/or disabilities and the impact on children's wellbeing (paragraph 97). Restraint should not routinely be the first response to managing challenging behaviours in the school environment.
10. The length of the new KCSIE is about right, the majority of school staff only have to read part one, the rest of the document is easy to navigate and links to further guidance and advice are provided. As mentioned earlier, an easy to read summary version of part one would help the wider workforce in schools understand the role they play in keeping children safe.
11. Finally, ADCS notes the Department has not addressed the concerns raised by Alan Wood in his 2016 review on multiagency safeguarding arrangements with regards to safeguarding children not educated in mainstream school settings, including in the home and in unregistered education settings, or illegal schools. Nor does the proposed draft address what role, if any, academy chains and regional schools commissioners will carry out in respect of child protection and safeguarding children, it would be helpful if these matters were considered in the final version of this important guidance.
12. If you have any queries or comments about the Association's consultation response, please contact Katy Block, ADCS Policy Officer via katy.block@adcs.org.uk in the first instance.