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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 emphasis on 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.
3. The emphasis on the role of the Designated Safeguarding Lead (DSL) in light of the conclusion of the Children in Need (CiN) review is helpful. These children and young people often have poorer educational outcomes and while raising aspiration for this cohort is welcome, support must also be focused on addressing their wider needs through the use of early help. ADCS *Safeguarding Pressures Phase 7* 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 or children's centres. 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 goal. Only social-emotional interventions over a sustained period of time will free up children to learn.
4. According to the CiN review around 1 in 10 of all children have been supported by a social worker at some point. Tailored interventions to support classroom learning may be required to meet the needs of individual children and young people experiencing difficulties, but given the size of the cohort it would be beneficial to take a more holistic approach to improving outcomes. ADCS is concerned that the growth of 'zero tolerance' behaviour policies in schools and an emphasis on 'expulsions' does not serve children in need well. 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 growing 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.
5. 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

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safeguarding. While there is a short section on 'education at home' for children who have been asked to do so, there is no recognition of the potential increase in online schools that could pose a safeguarding threat. ADCS last year responded to a Department for Education consultation on an accreditation scheme for online schools. 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 alive to any increase in the number of online schools that parents may use to supplement their home education experience. ADCS welcomes the Department's subsequent commitment to proceed with an Online Education Accreditation Scheme.

6. ADCS supports the inclusion in Annex B of further information that schools should be aware of such as child criminal exploitation, child sexual exploitation and serious violence. Those identified as becoming criminally exploited are not always known to children's social care or the police but are almost always known to wider services e.g. staff in educational settings, youth workers or youth offending teams or health services. Schools are critical in both early identification and preventative efforts.
7. With regards to the section on multi-agency safeguarding arrangements (paragraphs 83 – 91), 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, it would be helpful if the requirement for schools to be proactively engaged with their local safeguarding partnership was clearly articulated here in KCSIE.
8. With regards to staff training in paragraphs 101 - 105, 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.
9. ADCS welcomes the emphasis on the need for information sharing between practitioners and local agencies and reinforcing the fact that data protection laws should not hinder this. Further, the greater focus on contextual safeguarding and what staff should be aware of is also a welcome addition.
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 in the first instance.