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SUBJECT:	Archwiliad Amddifyn Plant	-	Safeguarding Audit
REPORT FOR:	Discussion		

1. Summary

As laid down in legislation and statutory guidance, schools have statutory duties in regards to safeguarding the children in their care. The Welsh Government guidance, *Keeping Learners Safe*, outlines the roles and responsibilities of schools and governing bodies, and the Local Authority, in regards to safeguarding and child protection. Many local authorities and non-local authority-controlled maintained schools (i.e. academies and free schools in England) undertake a yearly audit of safeguarding and child protection to evidence their compliance with the duties placed upon them and to allow them to determine what they need to improve and how.

Powys has not carried out such audits on an annual basis, but has resolved to do so. The 2017 inspection of Children's Services provided an additional impetus. The Welsh Government's decision to commission the production of an audit tool that aligned completely with the requirements of *Keeping Learners Safe* was therefore timely. It should also be noted that the Welsh Government intend the requirement for an annual audit to be included in the revised version of *Keeping Learners Safe*.

The principal aims were to:

- Establish an understanding of the state of safeguarding practice in Powys schools;
- Support schools to understand the full range of duties they have in regards to safeguarding and child protection (Estyn's self-evaluation report does not cover all requirements as laid out in *Keeping Learners Safe*);
- Enable schools to evidence, to the Local Authority, Estyn and other stakeholders, their good practice;
- Allow schools to identify where they need to make improvements;
- Enable the Local Authority to understand what support may need to go into schools – this could be in the form of financing, updated policies and procedures, providing additional guidance, identifying and providing for common identified training needs, etc.

2. Methodology

All schools were asked to complete a Safeguarding Audit Tool and to return this to the Designated Safeguarding Lead in Education. The tool used was the tool commissioned by the Welsh Government and developed by Pobl & Gwaith/People & Work. This tool – the Draft Safeguarding Audit Tool and

Guidance – was distributed to all schools in February 2018 and was available in English and Welsh. Schools were asked to return this after the Easter holiday.

The tool deals with safeguarding in five distinct areas:

1. How safe does the setting feel?
2. How effectively do you communicate safeguarding issues and policies?
3. How effective is your approach to safeguarding?
4. How robust are your safeguarding practices?
5. How effectively are you working with others to safeguard children/learners?

Each section contains a series of questions under the broad heading, and schools are asked to give a RAG rating (red, amber, green) for each question, indicating whether, respectively, action is needed, some action is needed or no action is needed. When completing these RAG ratings, the school should provide evidence and not just 'tick a box'. Once this is complete, the school completes a summary, showing what RAG rating applies to each section as an overall measure, and also what are the (up to) three priorities for each section.

3.   Audit returns

In total, 94 schools were asked to complete the safeguarding audit. Completed audits were returned by 92 schools, which is a return rate of 98%.

- 77 of 79 primary (including infant and junior) schools returned the audit (96%).
- 11 of 11 high schools returned the audit (100%)
- 1 of 1 all-through schools returned the audit (100%)
- 3 of 3 special schools returned the audit (100%)

The two schools which did not return the audit were Churchstoke CP School, Cradoc CP School and Saint Mary's Catholic School.

- Saint Mary's: the head teacher was absent during the period when the audit was conducted, and so they were unable to complete the audit.
- Churchstoke: despite numerous attempts by different officers and administrative staff, no contact was ever made with the head teacher at Churchstoke, so it is unclear whether the school have even undertaken the audit.

One primary school have completed and submitted the audit. Their audit was completed in time, but was only submitted after the analysis of the responses had been completed, therefore their data is not included in the analysis. This does not alter the overall findings.

In completing the audit, not all schools adhered to the guidance provided, in that they may have:

- Simply ticked responses without providing supporting evidence;
- Not provided responses to every question;
- Not indicated what their planned actions are, either in some or all sections;
- Did not necessarily identify 3 actions for each section;
- Not completed the RAG ratings fully, or at all.

4.   Analysis

The main function of the audit is for schools to self-evaluate their own practice and formulate their own action plan for how to improve safeguarding in the school. A secondary function, however, is to

allow the Local Authority to have an overview of safeguarding in all schools, including identifying common themes for which the LA can plan and provide support.

When analysing the responses, all RAG ratings were collated, both at the level of the overall summary for each of the five sections and at the level of the individual questions within each section. This collation including recording how many responses were left blank.

The actions were also then analysed to indicate themes, with actions being grouped into broader categories. For example, one category was "site security and access, including sign-in procedures": any action which related to this theme was logged against that heading. The actions were analysed within each of the five sections. Where themes appeared in more than one section, the tally from each section was also aggregated.

Although schools had the option to identify 3 actions in each section, this did not necessarily result in 3 themes. More than one of the actions may have related to the same theme, or the action related to more than one theme.

5.   Findings

Section 1 – How safe does the setting feel?

Question	Number of responses	No action needed	Some action needed	Action needed	Modal response
Do learners feel safe in this setting?	91	74 (81%)	15 (17%)	2 (2%)	No action needed
Are you effective in listening to and acting upon learners' safety concerns?	89	69 (78%)	19 (21%)	1 (1%)	No action needed
Do parents/carers have confidence about safety in this setting?	90	65 (72%)	24 (27%)	1 (1%)	No action needed
Are there site security measures, including secure entry and exit points that help you feel safe?	91	62 (68%)	18 (20%)	11 (12%)	No action needed
Are there good measures in place to ensure effective safeguarding for extracurricular activities or off site provision?	91	82 (90%)	9 (10%)	0 (0%)	No action needed
Are the identities of all visitors checked, and do they sign in and out?	91	83 (91%)	8 (9%)	0 (0%)	No action needed
Are visitors made aware of your commitment to safeguarding?	91	62 (68%)	25 (28%)	4 (4%)	No action needed

Summary self-rating for Section 1:

Phase	No action needed	Some action needed	Action needed	Blank
Primary	31	39	2	3
Secondary	4	4	1	1
All-through	-	1	-	-
Special	-	-	2	1
TOTAL	35	44	5	5

Actions

Theme	Primary	Secondary	All-through	Special	Total
Site access/security (inc. signing in)	40	10	0	3	53
Listening to pupils	21	1	1	0	23
Safeguarding displays/information	15	3	0	0	18
Listening to parents	11	1	1	0	13
Specific approaches/programs	6	0	0	1	7
School council involvement	5	0	0	0	5
Improved communications (with parents)	3	1	0	0	4
Off-site procedures	4	0	0	0	4
Training for all staff	1	1	0	1	3
Improved internal procedures	1	1	0	0	2

Staffing levels	2	0	0	0	2
Before-/after-school activities	1	0	0	0	1
Record-keeping	1	0	0	0	1
Safeguarding audit/evaluation	1	0	0	0	1
Staff – annual update, verification of	1	0	0	0	1

Section 2 – How effectively do you communicate safeguarding issues and policies?

Question	Number of responses	No action needed	Some action needed	Action needed	Modal response
Are your safeguarding and child protection policies updated annually?	91	91 (100%)	0 (0%)	0 (0%)	No action needed
Do you review annually how well your safeguarding and child protection policies and procedures work?	91	71 (78%)	15 (16%)	5 (6%)	No action needed
Has everyone (learners, parents, agency staff, support staff, governors) been given information on what is in the policy?	91	59 (65%)	29 (32%)	3 (3%)	No action needed
Do the policies set out how, through teaching and pastoral support, staff can help to strengthen safeguarding and prevent abuse and neglect?	90	79 (88%)	11 (12%)	0 (0%)	No action needed
Is safeguarding treated as a priority issue in the senior management team?	91	85 (93%)	5 (6%)	1 (1%)	No action needed
Is safeguarding a regular item in staff meetings?	91	62 (68%)	25 (27%)	4 (7%)	No action needed
Is safeguarding a regular item in student council meetings?	91	18 (20%)	45 (49%)	28 (31%)	Some action needed
Is safeguarding covered regularly in your newsletter?	90	39 (43%)	36 (40%)	15 (17%)	No action needed
Are you confident that everyone recognises the child protection and safeguarding responsibilities placed upon them by *Keeping learners safe?*	90	74 (82%)	14 (16%)	2 (2%)	No action needed
Are safeguarding policies and practices easily accessible and explained on your website in a user friendly way?	91	50 (55%)	26 (29%)	15 (16%)	No action needed

Summary self-rating for Section 2:

Phase	No action needed	Some action needed	Action needed	Blank
Primary	17	54	2	2
Secondary	5	5	-	1
All-through	-	1	-	-
Special	1	-	1	1
TOTAL	23	60	3	4

Actions

Theme	Primary	Secondary	All-through	Special	Total
School council involvement	45	6	1	0	52

Website	36	1	2	0	39
Improved communications (with parents)	30	3	1	0	34
Safeguarding – staff agendas	18	4	1	2	25
Policy review/adoption	11	1	0	1	13
Training for all staff	10	2	0	0	12
Safeguarding – governor agendas	3	2	0	3	8
Safeguarding displays/information	3	2	0	1	6
Knowledge (*Keeping Learners Safe*/procedures)	5	0	0	0	5
Learner involvement	4	0	0	1	5
Staff – annual update, verification of	4	0	0	0	4
Listening to pupils	3	1	0	0	4
Child-friendly policy	1	1	0	1	3
Curriculum audit/review	2	0	0	1	3
Safeguarding audit/evaluation	0	2	0	1	3
Improve governors' role	2	0	0	0	2
Peripatetic/supply/volunteers	2	0	0	0	2
Before-/after-school activities	1	0	0	0	1
Record-keeping	0	0	0	1	1
UN Rights of the Child	1	0	0	0	1

Section 3 – How effective is your approach to safeguarding?

Question	Number of responses	No action needed	Some action needed	Action needed	Modal response
Are you confident that you are effectively identifying, recording and acting on safeguarding concerns?	91	78 (86%)	11 (12%)	2 (2%)	No action needed
Are you satisfied with the level of pastoral and additional support available to children/learners, including any who are at particular risk or vulnerable?	90	68 (76%)	18 (20%)	4 (4%)	No action needed
Are you confident that enough support is provided in setting to children/learners who have experienced abuse and neglect?	86	61 (71%)	21 (24%)	4 (5%)	No action needed
Do all staff know about the procedures for reporting absence or exclusions of a child/learner who is looked after; on the child protection register or where there may be a risk?	91	69 (76%)	19 (21%)	3 (3%)	No action needed
Are you satisfied that the curriculum provides children/learners with sufficient information about safeguarding? [please refer to the guidance for topics that should be covered]	91	63 (69%)	28 (31%)	0 (0%)	No action needed
Do you have an anti-bullying policy which complies with the Human Rights Act 1998 and Equalities Act 2010?	91	79 (87%)	12 (13%)	0 (0%)	No action needed
Do you have policies that address how to deal with the range of issues learners may be faced with?	85	68 (80%)	16 (19%)	1 (1%)	No action needed
Do you have a policy on the use of photography and video recording, are permissions collected from parents and adhered to, and are images used and stored in accordance with safeguarding advice?	91	68 (75%)	23 (25%)	0 (0%)	No action needed
Are safeguarding issues embedded into policies and practices that support attendance and behaviour (especially for those on the child protection or at risk register)?	91	72 (79%)	16 (18%)	3 (3%)	No action needed
Are you confident about your processes for addressing abuse, discrimination and harassment	90	70 (78%)	16 (18%)	4 (4%)	No action needed
Are you confident that your approach to physical intervention and restraint is appropriate? (evidence – a behaviour policy)	91	47 (52%)	36 (40%)	8 (8%)	No action needed

Summary self-rating for Section 3:

Phase	No action needed	Some action needed	Action needed	Blank
Primary	22	46	4	3
Secondary	6	4	-	1
All-through	-	1	-	-
Special	2	-	-	1
TOTAL	30	51	4	5

Actions

Theme	Primary	Secondary	All-through	Special	Total
Physical intervention	30	5	0	1	36
Policy review/adoption	25	2	0	1	28
Data protection inc. audio-visual issues	20	2	0	1	22
Curriculum review/audit	14	2	1	0	17
Record-keeping	12	0	0	0	12
Training on vulnerable groups	7	3	0	0	10
Safeguarding audit/evaluation	5	1	1	0	7
Training for all staff	7	0	0	0	7
Using outside agencies	6	1	0	0	7
Online safety	2	0	0	0	2
Training for specific staff/governors	1	1	0	0	2
Learner involvement	1	0	0	0	1
Resources/information bank for staff	1	0	0	0	1
Safeguarding – staff agendas	1	0	0	0	1

Section 4 – How robust are your safeguarding practices?

Question	Number of responses	No action needed	Some action needed	Action needed	Modal response
Is there a designated senior person (DSP), and a deputy, responsible for child protection?	91	90 (99%)	1 (1%)	0 (0%)	No action needed
Do staff/children/learners/parents/carers and outside agencies know who these people are? (e.g. are they named on the website?	91	68 (75%)	21 (23%)	2 (2%)	No action needed
Are you confident that all children's/learner's voices are heard? (evidence re quiet ones etc.)	88	68 (77%)	16 (18%)	4 (5%)	No action needed
Are all staff clear about what to do if a child protection disclosure is made and how it must be reported, recorded and monitored?	91	87 (96%)	4 (4%)	0 (0%)	No action needed
Would all staff know what to do if a concern was raised about a colleague, including about the head teacher/principal?	91	77 (85%)	11 (12%)	3 (3%)	No action needed
Have all staff and volunteers had child protection training that helps them to identify signs of abuse and know how to report concerns whether about abuse in the learning setting, in the home, or in other settings? Is this regularly refreshed with suitable training, in line with your policy?	91	75 (83%)	14 (15%)	2 (2%)	No action needed
Has the DSP and relevant Governor/s had safeguarding training in the last 36 months?	91	74 (81%)	16 (18%)	1 (1%)	No action needed
Are sufficient arrangements made for staff and volunteers absent during training?	90	81 (90%)	7 (8%)	2 (2%)	No action needed
Are temporary staff, peripatetic staff and agency staff made aware of safeguarding/child protection procedures?	90	66 (73%)	19 (21%)	5 (6%)	No action needed
Is there a central register that records the safeguarding training that all staff have undertaken, including an assessment of effectiveness and impact with appropriate updates?	91	52 (57%)	33 (36%)	6 (7%)	No action needed
Are safeguarding concerns shared securely with the designated senior person?	91	91 (100%)	0 (0%)	0 (0%)	No action needed
Are records stored securely with controlled access that protects confidentiality?	91	87 (96%)	4 (4%)	0 (0%)	No action needed

How well do staff understand their roles and responsibilities in keeping referrals confidential?	91	89 (98%)	2 (2%)	0 (0%)	No action needed
Are all staff clear about how to discuss a safeguarding concern or issue with a child/young person?	91	82 (90%)	8 (9%)	1 (1%)	No action needed
Do all staff (including temp staff and unsupervised volunteer) have DBS checks with barred list? And are these updated as required by your policy?	91	90 (99%)	1 (1%)	0 (0%)	No action needed
Is there a record that all staff appointed after 2002 have a CRB/DBS check and at the appropriate level?	91	91 (100%)	0 (0%)	0 (0%)	No action needed
Are you confident that Governors have sufficient knowledge to question and challenge safeguarding provision in the school?	91	69 (76%)	22 (24%)	0 (0%)	No action needed

Summary self-rating for Section 4:

Phase	No action needed	Some action needed	Action needed	Blank
Primary	25	44	2	4
Secondary	7	3	-	1
All-through	-	1	-	-
Special	1	-	1	1
TOTALS	33	48	3	6

Actions

Theme	Primary	Secondary	All-through	Special	Total
Peripatetic/supply/volunteers	23	2	0	0	25
Evidence effectiveness of training	17	3	1	1	22
Log of training	16	1	1	0	18
Training for all staff	14	2	0	1	17
Training for specific staff/governors	10	2	1	0	13
Listening to pupils	10	0	0	0	10
Safeguarding displays/information	10	0	0	0	10
Improve governors' role	6	1	1	1	9
Improved internal procedures	7	1	0	1	9
Website	8	1	0	0	9
School council involvement	5	0	0	0	5
Record-keeping	3	0	0	1	4
Safeguarding – governors' agendas	3	0	0	0	3
Learner involvement	2	0	0	0	2
Policy review/adoption	2	0	0	0	2
Safeguarding – staff agendas	2	0	0	0	2

Online safety	1	0	0	0	1
Supervision for designated staff	0	1	0	0	1

Section 5 – How effectively are you working with others to safeguard

Question	Number of responses	No action needed	Some action needed	Action needed	Modal response
Do you inform parents/carers and learners of support available within your setting and via other services or community links?	91	73 (80%)	14 (15%)	4 (5%)	No action needed
Have parents/carers and learners been informed of the setting's need to share information with other agencies if necessary?	91	62 (68%)	24 (26%)	5 (6%)	No action needed
Do you work with outside agencies to develop children/learners awareness of safeguarding issues?	91	88 (97%)	3 (3%)	0 (0%)	No action needed
Have relevant staff had training on working with other agencies in line with your policy?	90	53 (59%)	30 (33%)	7 (8%)	No action needed
Are you confident that your setting works effectively with other agencies in regard to child protection concerns?	91	81 (89%)	10 (11%)	0 (0%)	No action needed

Summary self-rating for Section 5:

Phase	No action needed	Some action needed	Action needed	Blank
Primary	37	26	2	10
Secondary	7	3	-	1
All-through	1	-	-	-
Special	2	-	-	1
TOTALS	47	29	2	12

Actions

Theme	Primary	Secondary	All-through	Special	Total
Improved working with outside agencies	19	2	0	1	22
Training for all staff	14	2	0	0	16
Data protection inc. audio-visual issues	11	1	0	1	13
Training for specific staff/governors	9	1	0	1	11
Record-keeping	7	1	0	0	8
Improved communications (with parents)	6	1	0	0	7
Learner involvement	5	0	0	0	5
Website	4	0	0	1	5
Cluster-working/sharing good practice	3	0	0	0	3
Curriculum review/audit	2	1	0	0	3
Physical intervention	2	0	0	0	2
Safeguarding audit/evaluation	0	0	1	0	1

Site access/security (inc. signing in)	1	0	0	0	1
Transition and transfer	1	0	0	0	1
Welsh language	1	0	0	0	1

Aggregated actions across Sections

Topic	Total
School council involvement	62
Training for all staff	55
Site access/security (inc. signing in)	54
Website	53
Improved communications (with parents)	45
Policy review/adoption	43
Physical intervention	38
Listening to pupils	37
Data protection inc. audio-visual issues	35
Safeguarding displays/information	34
Safeguarding – staff agendas	28
Peripatetic/supply/volunteers	27
Record-keeping	26
Training for specific staff/governors	26
Curriculum audit/review	23
Evidence effectiveness of training	22
Improved working with outside agencies	22
Log of training	18
Learner involvement	13
Listening to parents	13
Safeguarding audit/evaluation	12
Improve governors' role	11
Improved internal procedures	11
Safeguarding – governor agendas	11
Training on vulnerable groups	10
Specific approaches/programs	7
Using outside agencies	7
Knowledge (Keeping Learners Safe/procedures)	5
Staff – annual update, verification of	5
Off-site procedures	4
Child-friendly policy	3
Cluster-working/sharing good practice	3
Online safety	3
Before-/after-school activities	2
Staffing levels	2
Resources/information bank for staff	1
Supervision for designated staff	1
Transition and transfer	1
UN Rights of the Child	1
Welsh language	1

6. Conclusions and recommendations

Approach to the audit

The audit tool was distributed with comprehensive guidance notes. However, many schools did not follow these notes when completing the audit. The lack of familiarity with the tool and the timescale for completion may have contributed to schools not being able to take as much care and attention over the audit as might be desired. This seems to have carried through to the RAG-ratings as well. In all sections – with the exception of Section 5 – the responses to individual questions in each section were more positive than the overall RAG rating for the section. For example, the modal response for every question in Section 1 was green – no action needed. However, the modal response for the section summary was amber – some action needed. Some schools took this to the extent of rating their responses to individual questions and to the section summaries as green in all cases, but then still went on to set actions for improvement. The audit tool, therefore, has not necessarily been used rigorously or in a coherent fashion by some schools. Nevertheless, it is still possible to draw conclusions from the individual responses and the aggregated data.

The intention expressed in the covering letter – namely, to conduct the audit with a number of schools each year – should therefore be adhered to, in order to drive an improvement in the approach to and use of the audit.

Section 1

Site access and security is an area of concern for many schools. In a large number of cases, this is an issue regarding the physical structure of the school and its environs, with a number of schools identifying issues with:

- Fencing;
- Gates;
- Entrance doors;
- Reception areas;
- Co-location with community facilities.

In other cases, the issues were to do with signing-in and visitor procedures and protocols, and improving staff knowledge and skills around this.

Schools also clearly feel that they need to be listening to the voice of the learner more in regards to the school being a safe place, whether through pupil voice across the student body, or via the forum of the school council.

There is also a need for schools to improve their safeguarding displays and visible information so that all stakeholders (staff, pupils, parents and visitors) know and understand:

- Who has a designated role;
- What the school's approach to safeguarding is.

Section 2

Communication with learners again was a priority issue. Many schools identified that they need to work collaboratively with learners, mostly through the school council.

Communicating with parents regarding safeguarding is also a priority area, both via newsletter and through the website. A general impression was gained that keeping websites updated and up to date is a particular issue for a number of schools.

Section 3

By far the most important issue in Section 3 is physical intervention, with a number of schools identifying that a lack of provision of training by the Local Authority is a key problem.

Schools have also been able to identify, thanks to the audit, where they may not currently have, or need to review and update, certain policies relevant to safeguarding.

Unsurprisingly, data protection, including permissions for the use of photography and videoing, was also an area of concern, which is to be expected given the recent advent of GDPR.

Section 4

Although the top theme in this section was ensuring that supply staff, volunteers and peripatetic staff are aware of safeguarding policy in school, training was identified as the biggest priority, whether for all staff or just for designated and key staff in relation to certain topics.

A number of schools noted that they need to improve their internal monitoring of training undertaken, both by maintaining a log but also by analysing the effectiveness of any training.

Section 5

Although a majority of schools felt they work effectively with others, there is a need to improve joint working with outside agencies.

Overall

There are a number of areas which schools will need to take forward individually. However, from the aggregated list at the end of part 5 of this report, it can be seen that the Schools Service should consider how it can support schools in Powys in relation to:

- Improving site security and access;
- Contributing to a menu of training and facilitating training opportunities for school staff and governors;
- Supporting schools with the management of their websites;
- Providing updated model policies and creating new policies that do not currently exist;
- Supporting schools with the issue of physical intervention.

Action Plan

The Schools Service will develop an action plan based on the findings of the audit. This action plan will feed into a workstream looking at the support, challenge and training provided to schools and their governing bodies. Suggested foci for the action plan:

- Develop new training packages relevant to both different roles in schools and governing bodies, and to specific issues/processes;
- Joint work with health and safety colleagues to identify key site security and access issues and remedies to them;
- Implement a new physical intervention policy and programme of training;
- Refresh Schools Service overarching policies and model policies for schools;

- Create a rolling programme of direct audits of schools.