# Audit of Safeguarding Procedures

12<sup>th</sup> – 13<sup>th</sup> November 2014

An independent audit of safeguarding procedures at Golborne Community Primary commissioned by Golborne Community Primary School and carried out by Christine Ellison and Clive Smith. Its purpose is to provide an independent perspective of how well the school meets its statutory obligations to ensure the safety of the children in its care and how well its policies, procedures and practice promotes the welfare of its pupils.

Commissioned by Golborne Community Primary School

Christine Ellison
Clive Smith

### Audit of Safeguarding Procedures at Golborne Community Primary 12-13 November 2014

This independent audit of safeguarding procedures at Golborne Community Primary was commissioned by the school in response to an ongoing series of complaints made by a small minority\_of parents and carers of children attending the school. Evidence provided indicates that two of the complaints received by the school were made at the same time following a similar process, which would indicate some contact between the parents. The children of one of these parents no longer attend the school. There were also some malicious comments placed on 'Facebook', within the public domain around the same time.

The purpose of the audit is to provide an independent perspective of how well the school meets its statutory obligations to ensure the safety of the children in its care and how well its policies, procedures and practice promotes the welfare of its pupils. Via the local authority the Headteacher sought the assistance of two independent professionals with appropriate experience in safeguarding, the education of pupils and behavioural management.

Christine Ellison and Clive Smith were commissioned to carry out a comprehensive and independent review.

Christine Ellison is qualified in Social Work having worked as a social worker within the Children and Families directorate including work as duty social worker and supporting children with complex needs. Christine Ellison also worked as the former business manager for Wigan Safeguarding Children Board and was a Local Authority Designated Officer, managing allegations against adults working with children. Christine Ellison, now works as an independent social worker and social work educator with two North West universities and gives advice on safeguarding.

Clive Smith is a qualified teacher with extensive experience in behavioural management and working with children with special educational needs. He worked for 11 years as a member of Wigan's Behaviour Support Team supporting schools in managing pupil behaviour and writing and implementing associated policies. Prior to that he worked as a member of Lancashire Education Authority's Autism Support team. He qualified and worked as a registered inspector for Ofsted carrying out a range of inspections in special and mainstream primary schools. He now works as a national trainer on issues to do with Special Educational Needs and Disabilities.

The report that follows is a record of that audit and its conclusions. It is recommended that the school's Ofsted report is read in conjunction with this report to obtain a very clear view of the standards of management and leadership in school, which impact directly upon the findings of this safeguarding review.

#### **Process of Audit**

An initial meeting was held on 22<sup>nd</sup> October 2014 with Christine Ellison, Clive Smith, Mr Hunt (Headteacher) and Mrs Dickinson (Deputy Headteacher) to discuss the background to the request and the terms of reference for the audit. The school was asked to arrange meetings with a group of students from both Key Stages, a representative group of all staff within the school and discussions were to be held with the senior leadership team and the chair of governors, the governor responsible for safeguarding and a parent governor. It was also requested by ourselves that opportunities were made available for observations in a range of classes throughout the Key Stages, an examination of all school areas, observations of transitions within school and to observe pupils during mealtimes and outside at break times. It was agreed that rather than inviting a small group of parents to a specific meeting within school that parents would be spoken to informally in the playground each morning from 8.30 onwards. To that end letters were to be sent to parents to inform them of this.

The Headteacher agreed to prepare a time table to accommodate all the planned evidence gathering.

Prior to the audit, policy documents, which are also available on the school website were viewed. Records held by the 'Local Authority Designated Officer' (responsible for managing allegations and complaints against staff and volunteers within the authority) were viewed by Christine Ellison.

During the audit we were given complete access to school documentation including

- Child Protection Information
- Health and Safety Policy
- Safeguarding Procedures Feb 2014
- Golborne Community Primary Parent Questionnaire analysis 2014
- Analysis of 2014 parental questionnaire
- Anti-Bullying Policy 2014
- Complaints File and relevant evidence

#### The following evidence was examined

- Safeguarding logs
- Serious incident logs
- Contact with parents logs
- Complaints files and records of follow up action
- SEND files
- Behaviour intervention plans
- Reviews of policies and procedures
- Cause for concerns records
- Logging of and review of serious incidents
- Child protection records
- 'Looked After Children' files
- Parental contact records
- Contact with other agencies records
- The results of parent questionnaires

#### **Summary of findings**

The evidence from our two day audit is that Golborne Community Primary school is a well-managed school that meets all its statutory requirements in regard to ensuring their pupils are safe and promoting their welfare. The Senior Leadership within the school have a clear focus regarding their roles in this context and have developed written policies regarding safeguarding and promoting welfare. All school staff are made aware of the content of these policies and the procedures that accompany them to ensure the promotion of safeguarding principals. The school has an effective complaints policy in place and has fully followed guidance on following up complaints and allegations. However, the school's recording system for complaints, safeguarding, serious incidents and parent contact logs would benefit from further consideration to ensure that recording is systematic and able to inform strategic planning.

Pupils enjoy coming to school and through observations of their demeanour in a variety of settings feel safe and enjoy a positive relationship with adults in the school.

The school environment provides a safe and secure environment for children including those identified with additional needs related to education and disability. Throughout the school there is a very consistent and positive approach to promoting and maintaining a good standard of behaviour. The majority of parents have indicated through either questionnaires responded to or in discussion that they feel that their children are well cared for and safe in school. Individual parents have indicated that school staff go further than required to support them as families and promote their children's welfare.

The Ofsted report of June 2013 whilst critical of several aspects of the school's performance stated, "Pupils are happy, safe and secure in school. Their behaviour is good and they attend regularly. Pupils' behaviour is good. They are considerate and polite. Pupils say they feel safe in school and that there is always someone on hand to help them if they have a problem."

#### **School Policies and Procedures**

These form the foundation of the school's response to ensuring the safety and welfare of their students. It is important that school policies reflect current practice and are well understood by staff, governors and parents. This should be achieved by parents, governors and school staff all being involved through consultation in the development of the policy. The school's Safeguarding Policy, which in common with other schools in Wigan is based on the Local Authority model, prior to the audit was out of date. Thus the school's policy did not reflect certain aspects of present legislation and guidance. It pre-dated the government guidance, "Working Together to Safeguard Children" published in 2010 and 2013; therefore it does not reflect the present recommendations, specifically the section concerning 'Managing Allegations'. However, the Local Authority have recently ratified a new Safeguarding Policy for schools which, has been presented to schools. The revised document being made available to Wigan schools in the week preceding the audit. This document whilst meeting all present statutory requirements at the time of the audit had not yet been ratified by the governing body and thus could not be made available to parents and staff. After the policy document has been agreed and signed by the Board of Governors it will be made available to carers and parents via the school web-site. This policy clearly reflects present statutory guidance with regards to 'Managing Allegations', 'Whistle Blowing' and 'Behaviour Management Policy' (Positive Discipline Policy).

The safeguarding policy also has an appendix 1, "recognising signs of child abuse" and appendix 2, "information on additional forms of abuse". The new policy is a comprehensive and up to date document. The school have also adopted and have on their web-site the Government guidance 'Keeping Children Safe in Education' which has links to a number of other government documents specifically related to safeguarding children.

The school Complaints Policy has also recently been updated with support from the National Union of Teachers and the Local Authority legal department. This policy has been ratified by the board of governors and includes a form for parents to complete with clear instruction on how to make a complaint and this also includes a review request form.

The Positive Discipline Policy is available on the school's web site for parents to read. In our informal discussions with parents it was apparent that many were not aware of many school policies. Many parents interviewed, expressed an opinion that as their children were happy and behaviour and their learning achievements had improved considerably they did not feel the need to study these policies. Despite this expression of confidence in Golborne CP it is important the school seeks ways to involve the parents in policy development and to ensure that they are taking the parents as key stakeholders in the school with them in the process of developing and implementing policies. The school has taken some action to increase parent's and carer's knowledge of the policies through such innovative practices as running quizzes where the answers to the questions can be found within the school policies and on the school website

Beyond these documents, which are a statutory requirement there is a comprehensive set of policy documents for many aspects of school procedures. All of these documents give due weight to issues of Child Protection and ensuring the safety and welfare of children in school and make staff aware of how to monitor and respond to various issues, including a policy outlining the appropriate procedure for reporting any concerns about practice within school.

#### Action:

The school should seek ways to ensure that parents are both involved in policy planning through consultation. This may be through simple consultation providing a synopsis of key factors in the policy, making draft policies available on the school's website for a period. Or a possible consideration maybe meetings within school. During the audit an observation of the Year 4 parent assembly was undertaken. This was well attended, however, there was a significant period between parents coming in to the hall after bringing their children and the moment when the children entered the hall. This period could be usefully developed as an informal briefing on school issues including an update or introduction to school policies and to their importance in their child's school career.

#### **Safeguarding Issues**

Whilst the school's policy prior to the audit was not up to date it was clear that all recent relevant legislation underpinned school development. All staff, governors and volunteers spoken to had a good awareness of their responsibilities regarding Child Protection. They were aware of, who to report concerns to and where to find guidance. Staff and volunteers were provided with a leaflet that summarised the information necessary to ensure that they knew their responsibilities and how to act upon any concerns they may have. The school has a teacher taking a lead on 'e-safety'. Children spoken to displayed a good awareness of e-safety and further information regarding this important aspect of safety has been shared with parents in assembly.

The safeguarding file made available was dated from September 2014 and only had one entry. However, concerns were clearly raised in other logs such as serious incidents and parental contact logs. Files were reviewed in respect of reporting concerns and complaints, and in particular complaints that related directly to the welfare of pupils. The complaints file while holding a lot of information, did not summarise the information, record actions and outcomes, some of the information being recorded online and some in paper files. The file for parent contacts had a section for recording outcome this was not used consistently nor was there evidence to indicate follow up action had been monitored.

#### **School Staff, Governors and Volunteers**

It has to be noted that there was a good awareness of roles and responsibilities and safeguarding training had recently taken place. The governor with responsibility for safeguarding was especially knowledgeable having been with the school for 6 years as a governor. The governor was up to date with recent changes to include the updated Wigan Safeguarding Children Board, 'WSCB' web-site and guidance. She emphasised the common focus within the school on safeguarding issues and that the school whilst open and friendly maintained a professional distance with parents and carers necessary to ensure clear professional boundaries around safeguarding issues. She indicated that the children now know what to expect and the ambassadors have blossomed as a supportive structure. The Parent Governor and the Pupil Voice Governor both commented on the positive and focussed attitude of the school's staff as a strength of the school. They felt the positive reinforcement approach with recognition being made of achievement in all areas, academic and behavioural strengthened pupils' empathy and was creating a cohesive school. Governors felt well supported by the school in being provided with appropriate training in all areas of safeguarding including 'Safer Recruitment' 'Child Protection' training. There was some criticism of the level of support from the Local Authority in some of the challenges the school had faced in some areas.

Expectations have increased from staff and pupils, academically, behaviourally, socially and emotionally with outcomes for children having improved. Staff felt strongly that the changes in management had led to a consistency throughout the school that was a significant strength. Staff also indicated that they felt well supported and their role was enhanced by the calm atmosphere that was being developed throughout the school. They also commented that the degree of communication throughout the school ensured that everyone knew what their role was, what was expected of them and what they were supposed to be doing in any situation.

#### Parents' views

As indicated a decision was reached not to hold formal discussions with the parents but approximately 20 parents were spoken to as they were bringing their children to school. The vast majority of parents with longer experience of the school indicated that they were pleased with the improvements in achievement of the children and of the behaviour throughout the school. Two parents whose children were involved in incidents with other pupils felt that the follow up to the incident by the school was prompt and they were satisfied with the outcome. The majority were happy with the level of communication from the school and the information provided. Several commented positively on the school's change in structure at the start of the day that allowed them to talk to their children's teacher. They also praised the readiness of school to provide verbal information and support. This broad view of parent school relationships is supported by the results of a survey undertaken through a questionnaire issued by the school. One parent stated "Great staff and governors, impressed with the recent changes that have been made to improve the school" This was the general opinion of the random group of parents and children spoken to upon their arrival at school. While some parents identified issues in the past with regard to communication and dealing with their concerns they generally felt that this had been resolved. The Headteacher or other members of the senior management team make themselves available on the playground from 8.30 a.m. to meet parents and carers. Children were allowed into class earlier and teachers are expected to be in their classroom from this opening time to allow parents an opportunity for informal chats about concerns. Parents expressed an opinion that the Headteacher and school staff have taken the school forward in a relatively short time. They believe that school has very clear expectations for the behaviour of the pupils and staff. There were comments from some parents who suggested that the school was not as friendly as it had once been. These were in the minority and generally related to improvements in safeguarding affecting access to the building. The school has restricted some aspects of involvement with the community that has resulted in reduction of access. A significant note of contention was the disbanding of a PTA (Parent Teacher Association). Whilst this is not germane to the safeguarding issues it did feature within complaints to the school. Responses in the complaints file indicated that it was not a priority in the school plan and that time and energy was being devoted to improving achievement and responding to the key actions identified in the section 5 Ofsted report of June 2013

#### **Pupils' views**

A meeting was held with the 'School Ambassadors' this included a pupil representative from every class. The children spoken to expressed a unanimous feeling that they felt safe and felt that if they had concerns there was always an adult that they could talk to. Many used the word 'happy' when asked to describe the feelings about school. Several parents commented that their children looked forward to coming to school. The ambassadors commented specifically on feeling safe because of the fences around the school and trees that had been removed around the playground.

#### Behaviour within school

Complaints levelled against the school related to bullying and the most recent Ofsted review identified working on creating a uniform response to deal with what defines bullying and the school community's perceptions of bullying. Work has been undertaken in school with both parents and children around bullying as an aspect of behaviour. The school bases their anti-bullying response on the 'Seven Steps Approach', widely used within Wigan and other authorities. The school ambassadors have been provided with information and training on bullying and how to support other children. The children were happy with the new positive behaviour approaches and felt that they have impacted on their feeling of safety. The school parental satisfaction questionnaires indicated that the majority of parents felt that the school dealt well with issues of bullying, several

parents felt they couldn't answer this question and a very small minority felt that the school did not deal well with bullying.

Pupils expressed a very positive opinion when asked about behaviour in school. They all said that they knew what was expected from them and they liked the consistency throughout the school to behaviour. They liked the 'Rainbow' system used in classrooms to help them to think about their behaviour and were happy with the systems that recognised their behaviour and achievement. They specifically liked the Headteacher Award. From observation of the children they appeared happy and confident some introducing themselves on the playground.

#### Actions:

The following recommendations are based on interviews with the senior leadership team, staff within the school, governors, volunteers and an audit of policies procedures and records.

- The terminology in the new safeguarding policy for some documents differs slightly from the school's, this should be amended; this includes identifying when documents are on-line.
- A more systematic approach to recording information in respect of safeguarding is recommended. This would be to record a summary of the initial concern or complaint using a chronological approach to recording actions and outcomes. This should also include a tracking sheet that identifies where information is held, where a separate file has been set up specifically related to an individual child or family. It is also important to identify who is responsible for actions.
- Where concerns are identified at a lower threshold than child protection to discuss and log
  these with the Gateway Team. (There had been a delay in response from Gateway services
  in the past and advice had been given by the Local Authority because of a complaint made
  by parents; not to report non-school attendance until the complaint had been resolved, see
  below).
- In respect of the above to also note that guidance for Allegations Against Staff in Working Together 2010 & 2013 which states "If an allegation is unfounded or malicious the employer should refer the matter to children's social care to determine whether the child concerned is in need of services, or has been abused by someone else. In the rare event that an allegations is shown to have been deliberately invented or malicious the police should be asked to consider whether any action might be appropriate against the person responsible" (Working Together 2010 appendix 5 page 363)
- To continue to raise awareness of the school's excellent website and online information, while also acknowledging that some parents might not have internet access by looking at ways to identify and inform these parents.
- Looked After Children to insure that Social Care meets their statutory duty in relation to Looked After Children; where there are difficulties to include children who are in, Out of Borough placements, to enlist support and advice from the WSCB business manager

The above actions are part of the improvements within the school and are not concerns. There is clear evidence of the progress the Headteacher has made in a short period of time and this report acknowledges that some of these changes while benefiting the majority of children in the school, have met with some resistance from a small group of parents. However though observation of children within school and discussion with children, there is evidence of the benefit of these changes

to the children and their education. The present inspection and Ofsted reports also acknowledge the improvements and ongoing planning within the school.

## Review of complaint procedures, serious incidents records, incidents of concern records, contact with parents and behavioural intervention plans:

The complaints file records complaints but in some case the process of reporting and responding to allegations or complaints is blurred, this in part related to multiple reporting of the same incident and the section in the safeguarding policy on managing allegations, which was out of date with local and national guide lines (this was not written by the school).

The school maintains a comprehensive record of 'Serious Incidents' in school via a pro-forma sheet. Recording of incidents is comprehensive and extensive, however in our opinion the quantity of recording is not matched by quality. In many cases and possibly out of a desire to ensure transparency many comprise a lengthy essay of who did what and who said what. There was also a distinct lack of consistency in recording 'follow ups' to serious incidents. In some instances this area was left blank, in others simple statements such as monitor the pupil. These elements taken together, over reporting and imprecise or absent follow up recommendations increases the difficulty of monitoring serious incidents realistically and more importantly ensuring that subsequent actions are measured, proportionate and effective.

Separate to these records the school maintains a set of 'Behavioural Intervention Records' that identify planned interventions. The intervention records correlate and in some few cases are cross referenced to the present 'Serious Incident' records but do not in their present form provide a clear view of both behaviour interventions and serious incidents.

The 'contact with parents' logs was comprehensive but there were several inputs that directly related to others logs such as safeguarding, bullying and complaints. For instances letters from parents and carers are available that indicate incidents of pupils lying, feeling un-liked yet no mention or cross referencing to the safeguarding files. There is clear evidence that such behaviours and emotions have a direct link to pupil self-esteem and behaviour. Where inputs overlapped there was no consistent system of cross referencing to allow recording, concerns and actions to be followed through. For pupils with identified special educational and disabilities needs their records demonstrated clearer recorded links from concerns to actions and monitoring.

#### Actions:

Complaints: A more systematic approach to the complaints log is required following the format outlined in the actions on safeguarding. An initial complaint triggering a log would set up a file to contain evidence and responses in a chronological format. As with safeguarding, information outside the complaints log that is relevant should be cross-referenced in the complaints log. Follow up actions should be noted and monitored. Where digital responses are made e.g. emails then either a hard copy should be added to the file or for reasons of confidentially the location of the file should be cross referenced.

Specifically related to complaints procedures there is a form for parents. Developing this to record outcomes and response to parents would support the complaints process.

Serious Incidents: The school should examine the present system with a view to identifying the key elements of the serious incident log that are required to provide a concise record but one that separates the component elements of a serious incident. E.g. many of the incidents began as a result of non-compliance with staff instructions, following intervention they escalated to verbal abuse and

then to a position where staff or other pupils were put at risk. Refusal to follow instructions is a serious issue and requires a focused and planned intervention. Abuse towards staff and pupils is also a serious incident but the intervention strategies will be different. This means that in an incident that occurs over a period of time staff will identify, record and provide follow up action for the individual elements

Where it is felt necessary to provide a detailed script of the whole incident this should be provided as additional evidence to the serious incident pro-forma and cross referenced on the serious incident log.

The school's approach to management of challenging behaviour is based upon the training they have received in Team Teach. It is good practice after such a serious incident that a supervision session is held with someone skilled in Team Teach principals to consider what aspects worked well, which didn't and the impact for further training this may have.

Contact with parents: As indicated previously several of these notes contained material that should rightly have been recorded in the safeguarding log. As with the other sections contact with parents information should be reviewed and a decision made to create a log that identifies concerns, further action and follow up monitoring and cross referencing to other information.