



# **Addendum COVID 19**

**March 2020**

## **Child Protection and Safeguarding Policy**

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## **Document Provenance**

This COVID 19 Addendum to our E-ACT Child Protection and Safeguarding Policy was approved by the Executive Leadership Team on 31 March 2020.

It provides updated guidance in response to the Government and Department for Education (DfE) requirements issued in ' Coronavirus (COVID-19): Safeguarding in schools, colleges and other providers', guidance 27 March 2020, found at:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

This Addendum is complementary to our current E-ACT Child Protection and Safeguarding Policy 2019.

This Addendum document is to be **used with immediate effect** as it sets out our processes and procedures pertaining to each aspect issued in the updated guidance from the Department for Education on 27 March 2020.

The Executive Leadership Team will review this Addendum during the COVID 19 period and we will reissue this as needed in response to further updates from the DfE.

## **Safeguarding arrangements for our Physical and Virtual E-ACT Academies**

This addendum references 'physical' and 'virtual' academies. The 'physical' academies include where pupils are on site at an E-ACT provision (i.e. a standalone academy or cluster of academies) and the 'virtual' academies include where E-ACT facilitates learning for our pupils online or remotely (i.e. when at home).

In line with the updated COVID 19 DfE requirements from 27 March 2020, all E-ACT academies will liaise closely with the three local safeguarding partners to ensure we are fully aware of the latest updates and advice to support our pupils and parents/carers. This includes Social Care, additional needs and the Local Authority Designated Officer. Where thresholds for support change, consideration will be given by the E-ACT Safeguarding System Leaders for escalating concerns where required. Any changes to the reporting mechanism for safeguarding will be shared with all Headteachers, Designated Safeguarding Leaders (DSLs) and the relevant safeguarding teams within each academy by the Safeguarding System Leader.

### **Our E-ACT Physical Academies**

#### **Pupils accessing this provision**

In line with DfE guidance March 2020, (COVID-19: guidance for vulnerable children and young people), there is an expectation that all vulnerable (i.e. those with a social worker and/or with an EHC plan) and pupils whose parents/carers are key workers are offered on site provision.

Using our knowledge of our pupils and links to external agencies, we will identify our vulnerable pupils and ensure there are individual plans in place to support the welfare and needs of the pupils. There may be some pupils that do not currently have a social worker but may require support through accessing on site provision. Each academy safeguarding team has identified these pupils and offered provision as appropriate. This is reviewed on a regular basis (i.e. weekly).

Academies and social workers will agree with families whether children should be attending education provision. The academy will follow this up with any parent or carer who has arranged care for their children and the children subsequently do not attend.

We will do this by:

- Contacting the parent and the social care team to discuss the needs of the family and the child.
- In all cases where a parent does not want to bring their child to the academy, and their child is considered vulnerable, the social worker and/or additional needs team will be contacted to explore the reasons for this.
- Where parents are concerned about the risk of the child contracting the virus, the academy or social worker will talk through these anxieties with the parent following the advice set out by Public Health England.
- The academy will take the opportunity when communicating with parents and carers to confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

The academy will ensure that all discussions and actions are recorded on CPOMS.

## **Our E-ACT clusters**

Where our academies collaborate and children and/or staff from multiple settings are clustered in one place, the principles in [Keeping children safe in education \(KCSIE\)](#) and this guidance will continue to apply. In particular, the E-ACT academy that is acting as the hub in the cluster will continue to provide a safe environment, keep children safe and ensure staff and volunteers have been appropriately checked and risk assessments carried out as required.

We will do this by:

- Sharing all relevant pupil information with the other academy. This information will be stored securely on the OneDrive. Staff can access additional guidance and a check list of the information that may be required within the folders.
- Being clear that it is an expectation that the SENCO and DSL are contacted directly for further information if the pupil is vulnerable or has a special educational need.
- DSLs working in collaboration to ensure all risk assessments for pupils are fit for purpose in line with their needs and the available provision at the academy.
- Making sure that this process is quality assured by Headteachers, System Leaders and Regional Education Directors.

The academy must continue to have appropriate regard to data protection and GDPR and they do not prevent the sharing of information for the purposes of keeping children safe. Further advice about information sharing can be found at paragraphs 76-83 of KCSIE.

To support others under the current COVID-19 outbreak, it may be required that E-ACT academies or clusters work in conjunction with other academies or local authorities (LAs) to provide provision for pupils outside of the Trust. Under these circumstances, the DSL would liaise directly with the school that the pupil is on roll in order to ensure that all essential information is provided (including safeguarding, SEND, behaviour, medical, dietary/allergy needs and mental health). There is an expectation that a discussion takes place between DSLs and that this is reinforced with all relevant documentation to fully support the pupil when attending. Any safeguarding concerns will be shared directly with the DSL (or relevant DDSL) at the academy in a timely manner.

Similarly, an E-ACT pupil may require provision from an academy or provision outside of the Trust and the same process would apply.

As part of the provision for all pupils across all E-ACT sites, a daily briefing will be completed for staff and pupils that includes reference to the DSL on site (or equivalent DDSL/senior leader) and how to report a concern. This will be further supplemented by daily check-ins with pupils to provide a platform for them to raise any concerns.

## **Staffing**

Headteachers (or relevant deputies) will coordinate the staff rota to ensure all ratios are adhered to without excess staff being on site (to support with the reduction in the spread of COVID-19).

This will include consideration for all statutory training requirements:

- DSL safeguarding

- First aid
- Paediatric first aid
- Administration of medication
- Specific medical needs (e.g. blood glucose monitoring)
- AEDs
- Fire Marshall.

This is reviewed on a daily basis and back-up staff are identified for all roles to ensure that any unavoidable absence does not impact upon the required coverage to ensure all pupils are safe.

Where the provision is an E-ACT cluster, the Headteachers from both settings will collaborate to ensure required staffing coverage at all levels (including senior leadership).

Our academies will continue to follow the checking and risk assessment process for any volunteers. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Regarding members of the academy staff already engaging in regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another academy to support the care of children.

Staff will wear the E-ACT green lanyard at all times and use this as their form of identify when they sign in/out of any E-ACT provision.

Staff working in other E-ACT academies do not need to be added to their SCR as Human Resource leads have remote access to all SCRs within the region.

In the event that staffing is required from outside of the Trust (but not that which is covered through supply staffing), a letter of reassurance must be obtained from the Headteacher of the school to confirm that all appropriate safer recruitment checks have been completed, that the member of staff has a valid enhanced DBS with children's barred list in place and that relevant training is in place. In accordance with the E-ACT SCR, Personnel File and Safer Recruitment Policy 2019 the member of staff must then be recorded on the academy SCR when meeting the criteria for regulated activity.

### **Safeguarding and DSL arrangements**

In line with the updated DfE requirements from 27 March 2020, if the DSL (or DDSL) is not able to be on site (i.e. in the event of illness or self-isolation) then the provision will still meet statutory guidance as long as they are contactable (e.g. by phone/online) and a senior leader has been assigned on site to oversee safeguarding and liaise with the DSL/DDSL where necessary. This is in place at every E-ACT provision and is included in the staffing considerations by the Headteacher.

It is essential that all staff continue to act immediately to report any safeguarding concerns in line with the E-ACT Child Protect and Safeguarding Policy: <https://www.e-act.org.uk/wp-content/uploads/2019/08/Child-Protection-and-Safeguarding-Policy-APPROVED-Aug-19.pdf>

This includes recording the concern on CPOMS and informing the DSL if the concern is urgent. In the absence of the DSL from site, as identified above the member of staff must inform the

senior leader on site.

Where the DSL (or relevant DDSL) is not directly on site, the DSL that is on duty remotely must be contacted directly by phone. CPOMS must still be used to record the concerns and all actions taken. If the member of staff is unable to access CPOMS, an email must be sent to the academy DSL to record actions taken.

If a member of staff or volunteer has concerns about a colleague (i.e. another member of staff or volunteer) who may pose a safeguarding risk or conduct is a concern, this should be reported immediately to the senior member of staff on site. The senior leader must report the concerns directly to the Headteacher who will then respond in line with the E-ACT Child Protection and Safeguarding Policy.

There may be occasions when, due to pupil numbers being low, staff may be working with groups or 1:1 with a child. Under these circumstances, all staff will:

- Adhere to staff code of conduct expectations in relation to working with children;
- Staff to follow a clear timetable for provision as planned in advance and shared with all staff on site;
- Ensure the environment is accessible to all (i.e. doors open and in shared spaces where possible);
- Utilise opportunities to work with other staff present wherever possible;
- Follow existing intimate care policy where required.

### **Monitoring Pupil Attendance**

Our E-ACT academies will complete the [daily online attendance form](#) to keep a record of children of critical workers and vulnerable children who are attending the academy. This allows for a record of attendance for safeguarding purposes and allows our academies to provide accurate, up-to-date data to the DfE on the number of children taking up places in each of our physical academies.

If a pupil is expected to be in the academy and does not attend, the academy will contact the parents/carers immediately.

We will do this by:

- Contacting the parent or carer by phone by 9:30am
- If no contact is made, the academy will use alternative methods (i.e. all reasonable enquiries) of contacting the parent/carers such as using the text service.
- If the child has a social worker or external agency involvement then contact will be made to update of the pupil absence to support with effective information sharing
- For all pupils, if our academies do not get a response, social care/Police must be alerted if there is a perceived risk of harm to the child.

The academies will record the attendance/absence of the pupil on the academy welfare tracker. The welfare tracker will be reviewed on a daily basis to record any changes to the pupils that are accessing on site provision.

The welfare tracker is reviewed regularly by System Leaders to ensure compliance with these expectations and any pupil concerns are discussed immediately with the DSL.

## **Vulnerable pupils**

Ensuring that vulnerable children remain protected is always a top priority for our Trust and remains so in this period. We will contact families directly to discuss the welfare and education provision for their child, involving social care and additional needs when applicable.

An EHC plan will be risk-assessed by the SENCO in consultation with the local authority (LA) and parents, to decide whether they need to continue access on site provision in order to meet their needs, or whether they can safely have their needs met at home.

We will ensure that the views of their parents/carers are captured and consider the following risks:

- the potential health risks to the pupil from COVID-19, bearing in mind any underlying health conditions. We will seek advice from an appropriate health professional where required.
- the risk to the pupil if some or all elements of their EHC plan cannot be delivered at all, and the risk if they cannot be delivered in the normal manner or in the usual setting.
- the potential impact to the pupil's wellbeing of changes to routine or the way in which provision is delivered.

Social workers and VSHs will continue to work with vulnerable children in this difficult period and should support these children to access this provision.

We will continue to work closely with social care and the virtual academy by:

- Contacting the social worker immediately if the pupil does not attend the provision
- Attending all virtual core group and case conference meetings
- Maintaining weekly contact with the social worker for updates on the pupil's welfare and family circumstances.
- Establish how often home visits will be conducted by the social worker and maintain records on CPOMS once completed.

## **Peer on peer abuse**

Our academies (and E-ACT clusters) must adhere to the E-ACT Child Protection and Safeguarding Policy 2019, in relation to 'allegations of abuse made against other pupils' (peer on peer abuse).

This applies in full under the revised safeguarding arrangements and all incidents of peer on peer abuse are recorded on CPOMS and reported to the DSL.

It is recognised that within our new E-ACT clusters there will be less developed relationships between pupils from different age groups and therefore priority will be given to support building relationships. Pupils may be taught with others from outside their immediate age group and all staff are aware that this may increase the risk of incidents of peer on peer abuse.

Staff have received appropriate training in how to identify the signs and symptoms of peer on peer abuse and are clear on the procedures to follow in line with our E-ACT policy.

It is also recognised that incidents of online peer on peer abuse may increase in light of greater online access by pupils. All academies have completed preventative work with pupils around online safety (linked to cyberbullying) and this will be supplemented by signposting during welfare checks for both pupils and parents/carers. Pupils have been informed of raising a concern with a trusted adult in the event that they do not have online access to raise a concern (e.g. via the 'Pupil Concerns' reporting tool on academy websites). The Safeguarding System Leaders, Headteachers and Regional Education Directors will keep this tightly under review and analyse the impact of this closely for those children without online access.

### **Staff Training**

E-ACT staff receive all appropriate training to ensure the safety of our pupils. However, it is recognised that under the current government lockdown in place as a result of COVID-19, all face to face training through external organisations has been suspended, which includes training for DSL safeguarding. In line with the DfE requirements, for the period COVID-19 measures are in place, a DSL (or DDSL) who has been trained will continue to be classed as a trained DSL (or DDSL) even if they miss their refresher training.

Each academy is in regular communication with LAs to ascertain opportunities for online training to provide appropriate updates where possible. In addition, E-ACT utilises EduCare (online training package) for various aspects of safeguarding (e.g. FGM).

Existing E-ACT staff will have completed all relevant safeguarding awareness training and signed to confirm that they have read and understood KCSIE Part 1 and Annex A. However, any new staff, volunteers or staff supporting from outside of the Trust will require a suitable safeguarding induction. This will be achieved 1:1 with the DSL where possible or an alternative will be implemented (i.e. online induction via TEAMS). Any E-ACT staff supporting within a cluster will be updated on academy-specific expectations during the daily staff briefing as required.

In line with standard procedures, regional HR will liaise directly with Headteachers to ensure the induction process is fully adhered to. This will be quality assured by Regional Operations Directors and Safeguarding System Leaders.

### **Our E-ACT Virtual Academies**

In most cases, the majority of children will not be physically attending the academy. It is important that all staff who interact with children, including online, continue to follow the guidelines we have issued in looking out for signs a child may be at risk.

### **Monitoring the welfare of our pupils**

It is vital that we continue to support all pupils who are part of our E-ACT virtual school. All academies must complete the required number of welfare calls on a daily, weekly and fortnightly basis in line with the updated guidance shared with E-ACT academies.

We will do this by:



- Allocating key staff on a daily basis to make the welfare calls.
- All calls will be recorded on the welfare check tracker that can be accessed on site and remotely.
- If a member of staff has any concerns or could not make contact, CPOMS will be used to log the concerns and alert the DSL for further actions that may be required.
- The welfare check tracker is quality assured by Safeguarding System Leaders and reported to the Executive Leadership Team (ELT) on a daily basis.

If the academies do not get a response to the welfare calls and there are concerns, social care/police must be alerted if there is a perceived risk to the child. If the academy has exhausted all reasonable checks and the referral does not meet the threshold for any involvement, the Safeguarding System Leader must be alerted for additional advice and escalation.

The Trust is currently advising against all home visits and instead we will review any cases that have been escalated and contact the police and/or social care directly for support.

If all reasonable enquires have been made and the academy is still unable to contact the pupil, a CME referral must be made in line with our E-ACT Child Protection and Safeguarding Policy.

### **Pupil reporting mechanism**

If a pupil from the virtual academy is worried or has a concern, they can access support via the 'pupil concern' link on the academy website. Staff will remind the pupils during the welfare calls where they can find this link. Pupils will also be reminded that they must always share any concerns with their trusted adult whilst they are part of the virtual school. This is also accessible for parents/carers to raise a concern. The main academy voicemail will be updated to include relevant signposting for pupils and parents/carers (i.e. Childline and mental health support).

Our academy websites must also contain relevant contact numbers and links to support children and families with mental health, online safety and safeguarding concerns.

### **Staffing reporting mechanism**

If a member of staff has a concern about a pupil through a welfare call or via online learning, this will be reported via CPOMS and if urgent, the DSL (or relevant DDSL) will be contacted immediately. Contact details for all safeguarding team members has been provided to all academy staff and this can also be found on the specific E-ACT academy OneDrive folder.

### **On-line Safety**

All academies will consider the safety of their pupils when they are asked to work online. The starting point for online teaching should be the same principles as set out in the staff Code of Conduct Policy. This has been updated and shared with all staff to reflect the new reality of so many children and staff working remotely online. It includes acceptable use of technologies, staff pupil/student relationships and communication including the use of social media.

The academy will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

We will ensure that all pupils know how to report an online concern by:

- All pupils have received preventative guidance from their academy around how to stay safe online;
  - All pupils will receive signposting to the 'pupil concerns' reporting tool;
  - All pupils will receive a discussion around online safety during welfare checks (including signposting to additional guidance from academy websites and below).
- [Childline](#) - for support
  - [UK Safer Internet Centre](#) - to report and remove harmful online content
  - [CEOP](#) - for advice on making a report about online abuse

The academy must continue to reinforce the importance of children being safe online via welfare calls. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the academy (if anyone) their child is going to be interacting with online. This will be achieved through regular updates from the academy in a variety of formats (e.g. social media updates, bulletins or newsletters, parent toolkit from academy websites etc).

### **Alternative Provision**

In our E-ACT academies we have a small proportion of pupils that access their education in an Alternative Provision (AP) setting; many of these pupils are vulnerable.

All academies will have an overview of all pupils attending AP and level of vulnerability. We will do this by:

- Contacting the AP provider to establish if the setting will remain open;
- Contact the parent and child to capture their views and involve the social worker if involved;
- If the pupil will continue to attend AP, the academy will complete twice daily welfare calls. Weekly welfare visits will be replaced by a weekly welfare call with the provider and the pupil;
- All welfare calls will be recorded on the tracker;
- If the AP provider is not remaining open or the pupil/parent chooses not to attend, the academy will complete daily welfare calls. The academy will discuss the needs of the pupil with the parent to ensure the provision at home will be suitably adapted to engage the pupil and meet their needs. The social worker will be involved if applicable.

### **Vulnerable pupils and/or pupils with an EHCP**

Our academies will continue to consider the needs of all children and young people that are vulnerable and/or have an EHCP who are part of our virtual academy.

We will ensure that the views of their parents/carers are captured and consider the following risks:

- the risk to the pupil if some or all elements of their EHC plan cannot be delivered at all, and the risk if they cannot be delivered in the normal manner or in the usual setting
- the ability of the pupil's parents or home to ensure their health and care needs can be met safely
- the potential impact to the pupil's wellbeing of changes to routine or the way in which provision is delivered

This must be evidenced on relevant documents and via CPOMS if required.

The academy may feel in certain circumstances that a separate risk assessment for an EHCP pupil may be required. A copy of the document should be uploaded onto CPOMS. If the academy has completed an LA risk assessment for the EHCP children, a copy of this document should be saved in the academy COVID-19 Safeguarding folder.

In circumstances where a parent/carer does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and education setting should explore the reasons for this, directly with the parent. The academies must ensure this is recorded on the relevant document and via CPOMS if required. Consideration for escalation should be completed in conjunction with the Safeguarding System Leader.

Academies may feel it is appropriate to complete a separate risk assessment for pupils where they are still concerns following discussions with the parent and social worker. The risk assessments will be stored on CPOMS and shared with staff.

The risk assessments will be reviewed on a weekly basis to ensure the needs of the pupil are met and in some cases, further social care involvement may need be required. The DSL will continue to update the social worker on a weekly basis.

### **Mental health**

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of our pupils, staff and parents. It is vital that we provide support in both physical and virtual academies.

There are currently at least 50% of the staff in our academies who have completed the MHFA qualification and therefore have the knowledge to identify signs and symptoms of a potential mental health issue.

We will provide support by:

- Daily check-ins with pupils accessing on site provision
- Welfare checks with pupils to include a discussion around wellbeing and further signposting as necessary
- Support from specialist staff (e.g. pastoral leads/mental health leads/play therapists/educational psychologists/counsellors) - This may be on site or remotely
- Deliver wellbeing activities (in line with the E-ACT Mental Health curriculum) for pupils accessing on site provision

- Wellbeing activities provided in educational packs for pupils to complete at home
- Signposting to mental health resources available online
- Referrals to external agencies where there are greater concerns around the wellbeing of a pupil.

Support for staff around their wellbeing is also essential and this will be coordinated in line with the E-ACT Staff Mental Health and Wellbeing Policy. This includes through effective line management and accessing the employee assistance programme.

### **Safer recruitment for staff and volunteers**

It remains essential that people who are unsuitable are not allowed to enter the building or gain access to children.

The academy will continue to follow the relevant safer recruitment processes in line with the E-ACT Safeguarding and CP policy and the E-ACT SCR, Personnel Files and Safer Recruitment Policy 2019.

In urgent cases where it is not possible to follow the normal identity checking guidelines to complete a DBS check, we will arrange for:

- ID documents to be viewed over a video link
- Scanned images to be used in advance of the DBS check being submitted
- Ensure the applicant presents the original versions of these documents when they first attend their employment or volunteering role.

Our academies will continue to follow the checking and risk assessment process for any volunteers. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The SCR should continue to be updated and checked for compliance as per policy. Staff working in other E-ACT academies do not need to be added to their SCR as HR leads have remote access to all SCRs within the region.

The academy will continue to follow their legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

The academy will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's '[Teacher misconduct advice for making a referral](#)'. During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk). All referrals received by the TRA will continue to be considered. Where referrals on serious safeguarding matters are received and it is deemed that there is a public interest in doing so consideration will be given as to whether an interim prohibition order (IPO) should be put in place. The TRA will continue to progress all cases but will not schedule any hearings at the current time.