Safeguarding Practice Audit- Keeping Children Safe in Education 2022

Part two: The management of safeguarding - The responsibility of governing bodies, proprietors, and management committees

Name of School/Education setting: Benington School

Date of audit 6/7/2023

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Introduction and guidance

Creating a Culture of safety, children who feel safe make better learners. A culture of safety should run through all aspects of school life; safe recruitment, staff conduct and behaviour, expectations of children's behaviour, support and learning to families about caring for children and supporting their development.

Safeguarding practice and procedures should be a shared vision and the responsibility of: Headteachers/principals, Designated Safeguarding Lead (DSL)/ Deputy DSL's, governing bodies, trustees, proprietors and management committees. This means you must ensure that there is arrangements in place to assist all staff to understand and discharge their role and responsibilities in compliance with as set out under legislation, **The Education Act 2002, Section 175 and 157 which** stipulates that you must have regard for Keeping **Children Safe in Education DfE September (KCSiE).** It is your ole to ensure policies, procedures and training in your setting are always effective and comply with the law.

KCSiE uses the terms **"must"** and **"should"**, "**must"** is when the person in question is legally required to do something and "**should**" when the advice set out should be followed unless there is good reason not to. The guidance **should** be read alongside:
• statutory guidance **Working Together to Safeguard Children**.

• departmental advice **What to do if you are Worried a Child is Being Abused** - Advice for Practitioners; and

• departmental advice **Sexual Violence and Sexual Harassment** Between Children in Schools and Colleges

There are nine separate audits in total that take account of most parts of KCSiE. Please note that these are is **not** a statutory requirement rather a method to use for best practice. You are not required to undertake all nine, these are a resource for you to use at your school's liberty if there are areas of safeguarding practice that you want to check.

It is recommended that you use these to self-evaluate practice via meetings between the nominated link governor for safeguarding, the Headteacher, principal, CEO of MATs and the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead/s.

To evidence best practice, it will be essential to speak to staff, volunteers and children and young people if relevant.   This is an opportunity for the leadership and management to review existing safeguarding practice arrangements and verify what is in place and is this effective and has good outcomes for children.

A RAG rating should be applied to all parts (see third column below) see the **action plan** on the last page of this audit.

Safeguarding areas of practice required	Evidence of how these duties are met	RAG rate
The responsibility of governing bodies, proprietors and management committees.	*As governors and proprietors, how do you ensure these duties are being met; what do they look like in your setting and what are you doing to demonstrate you are fulling your role and responsibilities to ensure arrangements are in place and are effective?*	
Legislation and the law: 78. Governing bodies and proprietors (GB & P) have a strategic leadership responsibility for their school's or college's safeguarding arrangements and **must** ensure that they comply with their duties under legislation. They **must** have regard to KSCIE 2022, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times. 79. Where a school or college has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at GOV.UK. see link page 24 KCSiE.	*The KSCIE is read and all updates are discussed in every September meeting.*	🟥 🟨 🟩☒
80. GB & P should have a senior board level (or equivalent) lead to take **leadership** responsibility for their school's or college's safeguarding arrangements. [20] In the case of academies, free schools and alternative provision academies the proprietor will be the academy trust. [21] Section 175 of the Education Act 2002 requires governing bodies of maintained schools and colleges, in relation to their functions relating to the conduct of the school or the institution to make arrangements for ensuring that such functions are exercised	The head is a trained DSL and we have a trained deputy DDSL	🟥 🟨 🟩☒

with a view to safeguarding and promoting the welfare of children who are either pupils at the school or are receiving education or training at the institution. The Education (Independent School Standards) Regulations 2014 apply a duty to proprietors of independent schools (which in the case of academies and free schools is the academy trust) to ensure that arrangements are made to safeguard and promote the welfare of children. The Non-Maintained Special Schools (England) Regulations 2015 oblige non-maintained special schools to comply with certain requirements as a condition of their approval and whilst approved by the Secretary of State. One condition of approval is that the proprietor must make arrangements for safeguarding and promoting the health, safety and welfare of pupils, which have regard to any guidance including where appropriate, the National Minimum Standards, about safeguarding and promoting the health, safety and welfare of pupils and, in the case of schools already approved, that these arrangements at the school with respect to these matters are in accordance with the approval given by the Secretary of State. For colleges, non-maintained special schools and independent schools: the definition of 'children' applies to the statutory responsibilities for safeguarding and promoting the welfare of children i.e. those under 18.
[22] Chapter 2 of Working Together to Safeguard Children.

| 81. Headteachers and principals should ensure that the policies and procedures, adopted by their governing bodies and proprietors, (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff. | All policies are read in September and staff and governors sign to say they've been read and understood. | 🟥⬜ ⬜🟨 ☒🟩 |
| **Whole school and college approach to safeguarding:** | Safeguarding is a standing item at all FGB meetings and staff meetings and on fortnightly newsletters to parents. | 🟥⬜ |

82. (GB & P) should ensure they facilitate a whole school or college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.		☐ 🟨 ☒ 🟩
83. Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.	All staff are aware of the procedures to report concerns. All documentation is readily available.	☐ 🟥 ☐ 🟨 ☒ 🟩
Safeguarding policies and procedures 84. GB & P should ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.	Al policies are available and clearly signposted and up to date on the website.	☐ 🟥 ☐ 🟨 ☒ 🟩

85. These policies should include individual schools and colleges having:
 	
• an effective child protection policy which:
 	
  ✓ reflects the whole school/college approach to peer-on-peer abuse (see para 145);
  ✓ reflects reporting systems as set out at paragraph 83.
  ✓ should describe procedures which are in accordance with government guidance.
  ✓ refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners.
	We use the Herts CP, behaviour and staff behaviour policies and ensure they reflects our setting.	☐ 🟥
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- ✓ includes policies as reflected elsewhere in Part two of this guidance, such as online safety (see paragraph 126), and special educational needs and disabilities (SEND) (see paragraphs 185-187);
- ✓ where appropriate, reflects serious violence. Further advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.
- ✓ should be reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt; and
- ✓ is available publicly either via the school or college website or by other means.

X a **behaviour policy**, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- ☐ X a **staff behaviour policy** (sometimes called the code of conduct) which should, amongst other things, include acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.

- ☐ **X appropriate safeguarding arrangements** in place to respond to children who go missing from education, particularly on repeat occasions (more information at paragraph 164).

[23] All schools are required to have a behaviour policy (full details are here). If a college chooses to have a behaviour policy it should

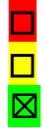|		
be provided to staff as described above. [24] When drafting the staff behaviour policy, schools and colleges should bear in mind the offence under section 16 of The Sexual Offences Act 2003, which provides that it is an offence for a person aged 18 or over (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. A situation where a person is in a position of trust could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if s/he does not teach the child.		
86. The above is not intended to be an exhaustive list. These policies and procedures, along with Part one (or Annex A if appropriate) of this guidance and information regarding the role and identity of the designated safeguarding lead (and deputies), should be provided to all staff on induction. 87. GB & P should take a proportionate risk-based approach to the level of information that is provided to temporary staff and volunteers.	Volunteers have access to limited information	🟥☐ 🟨☐ 🟩☒

88. In addition, governing bodies and proprietors should ensure:
 	
  ✓ **child protection files** are maintained as set out in Annex C;
 	
  ✓ **appropriate safer recruitment policies** in accordance with Part three of this guidance are in place.
 	
  ✓ and where reasonably possible, schools and colleges hold **more than one emergency contact number** for each pupil or student.
 	
This goes beyond the legal minimum. School Attendance Guidance. It is good practice to give the school or college
	Safeguarding is also checked as part of our HIP visit
	Governors and head teacher are safer recruitment trained
	We hold at least 2 contact numbers for pupils
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additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Further information for schools can be found in the department's Schools Attendance Guidance (link P 26)		
The designated safeguarding lead (DSL): 89. GB & P should ensure an appropriate **senior member** of staff, from the school or college **leadership team**, is appointed to the role of designated safeguarding lead (DSL). The DSL should take **lead responsibility** for safeguarding and child protection (including online safety). This should be explicit in the role-holder's job description (see Annex C, which describes the broad areas of responsibility and activities related to the role).	Head is DSL and deputy DDSL	🔲🟥 🔲🟨 ☒🟩
90. It is for individual schools and colleges to decide whether they choose to have one or more **deputy** designated safeguarding leads. Any deputy (or deputies) should be trained to the same standard as the designated safeguarding lead.	As a small school we felt two trained staff were adequate	🔲🟥 🔲🟨 ☒🟩
91. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for safeguarding and child protection, as set out above, remains with the DSL. This responsibility should not be delegated.		🔲🟥 🔲🟨 ☒🟩
92. The DSL and (deputies) should liaise with the safeguarding partners, and work with other agencies in line with Working Together to Safeguard Children. NPCC - When to call the police will help designated safeguarding leads understand when they should consider calling the police and what to expect when they do. See links on P 27	External agencies are consulted where appropriate	🔲🟥 🔲🟨 ☒🟩
93. During term time, the DSL and/or a deputy should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools and colleges and the DSL to arrange adequate	DSL or DDSL are always available	🔲🟥 🔲🟨 ☒🟩

and appropriate cover arrangements for any out of hours/out of term activities.		
94. The DSL and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated **every two years.**	DSL is booked on for refresher training	🟥 ☐ 🟨 ☒ 🟩 ☐
95. In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.	Head regularly attends head teacher briefings and updates where safeguarding is a standing item.	🟥 ☐ 🟨 ☐ 🟩 ☒
Multi-agency working: 96. Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. GB & P should ensure that the school or college contributes to **multi-agency working in line with statutory guidance Working Together to Safeguard Children.**	We work to support multi-agencies where appropriate	🟥 ☐ 🟨 ☐ 🟩 ☒
97. Safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police '**Hertfordshire Safeguarding Children Partnership'** (HSCP) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. See https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/hscp.aspx	We are part of Operation Encompass which enables us to receive information quickly from the police	🟥 ☐ 🟨 ☐ 🟩 ☒
98. It is especially important that schools and colleges understand their role within the (HSCP). GB & P, and their senior leadership		🟥 ☐ 🟨 ☐ 🟩 ☒

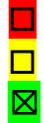|		
teams, especially their DSL's, should make themselves aware of and follow their local arrangements.		
99. Safeguarding partners have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role, they **must** set out how they will work together and with any relevant agencies. Relevant agencies are those organisations and agencies whose involvement the safeguarding partners consider may be required to safeguard and promote the welfare of children with regard to local need. Safeguarding partners will have set out in their published arrangements which organisations and agencies they will be working with, and the expectations placed on any agencies and organisations by the arrangements https://www.gov.uk/government/publications/working-together-to-safeguard-children--2		🟥☐ 🟨☐ 🟩☒
100. Working Together is very clear that all schools (including those in multi-academy trusts) and colleges in the local area should be fully engaged, involved, and included in safeguarding arrangements. It is expected that, locally, the safeguarding partners will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.		🟥☐ 🟨☐ 🟩☒
101. Once named as a relevant agency, schools, and colleges, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements. They must act in accordance with the safeguarding arrangements. *S27 of the Children Act 1989.*		🟥☐ 🟨☐ 🟩☒
102. GB & P should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their		🟥☐ 🟨☐

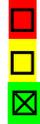|		
own policies and procedures. They should also be prepared to supply information as requested by the safeguarding partners. See the **Continuum of need** @ https://www.hertfordshire.gov.uk/microsites/families-first/families-first.aspx		☒
103. Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.		☐ ☐ ☒
104. All schools and colleges should allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. *Meaning if they call the school, they need to provide any information requested*		☐ ☐ ☒
Information sharing 105. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.		☐ ☐ ☒
106. As part of meeting a child's needs, it is important for GB & P to recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that set out clearly the processes and principles for sharing information within the school or college and		☐ ☐ ☒

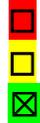|		
with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required.		
107. School and college staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.		🟥☐ 🟨☐ 🟩☒
108. It is important that GB & P are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. 109. GB & P should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR. This includes: ☐ being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'. ☐ understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where		

there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. ☐ for schools, not providing pupils' personal data where the serious harm test under the legislation is met.30 For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.		
110. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.		
111. Further details on information sharing can be found: ☐ in Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing ☐ at Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing information will be especially useful		🟥 🟨 🟩☒

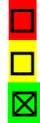|		
☐ at The Information Commissioner's Office (ICO), which includes ICO UK GDPR FAQs and guidance from the department ☐ in Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the UK GDPR. See links on page 30		
112. Where children leave the school or college, the DSL should ensure their child protection file is transferred to the new school or college as soon as possible, to allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives, also ensuring secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named persons with oversight for SEN in a college, are aware as required. See Gov guidance on Information Sharing https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice	All information is hand delivered to new schools and signed for.	🟥⬜ 🟨⬜ 🟩☒
113. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims		🟥⬜ 🟨⬜ 🟩☒

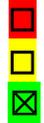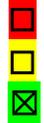|		
of abuse, or those who are currently receiving support through the '**Channel' programme** and have that support in place for when the child arrives. More information on the child protection file is in Annex C (Role of the DSL) . *(Channel programme relates to your Prevent duty, e.g. it is a provision that assesses and support CYP who are affected by extremism and at risk of radicalisation.*		
Staff training 114. GB & P should ensure that **all** staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with any advice from the safeguarding partners. *If in doubt about training required contact the Child Protection School Liaison Service on* cpslo.admin@hertfordshire.gov.uk		☐ 🟥 ☐ 🟨 ☒ 🟩
115. In addition, all staff should receive regular safeguarding and child protection updates, including online safety (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.		☐ 🟥 ☐ 🟨 ☒ 🟩
116. GB & P should recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and the child protection policy.		☐ 🟥 ☐ 🟨 ☒ 🟩

117. GB & P should ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety (paragraph 114) and the requirement to ensure children are taught about safeguarding, including online safety (paragraph 119), that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.		☐ 🟥 ☐ 🟨 ☒ 🟩
118. Whilst considering the above training requirements, governing bodies and proprietors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all pupils.		☐ 🟥 ☐ 🟨 ☒ 🟩
## Opportunities to teach safeguarding 119. Governing bodies and proprietors should ensure that children are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.		
120. Schools should consider all of this as part of providing a broad and balanced curriculum (colleges may cover relevant issues through tutorials). This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found here: Statutory guidance: relationships education relationships and sex education (RSE) and health education.	See RSE policy	☐ 🟥 ☐ 🟨 ☒ 🟩

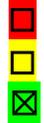|		
121. The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: Teaching about relationships sex and health. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help schools and colleges understand and teach about safeguarding: • DfE advice for schools: teaching online safety in schools; • UK Council for Internet Safety (UKCIS) [32] guidance: Education for a connected world; • UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people; • The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors; • National Crime Agency's CEOP education programme: Thinkuknow; • Public Health England: Rise Above.		🟥 🟨 🟩⊠
122. Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.		🟥 🟨 🟩⊠
Online safety 123. It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or	All the children's internet use is monitored	🟥 🟨 🟩⊠

college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.		
124. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk: • **Content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism; • **Contact**: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'; • **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and • **Commerce**: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group.		🟥☐ 🟨☐ 🟩☒
125. Schools and colleges should ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is		🟥☐ 🟨☐ 🟩☒

reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.		

Online safety policy 126. Online safety and the school or college's approach to it should be reflected in the child protection policy. Considering the 4Cs (above) will provide the basis of an effective online policy. The school or college should have a clear policy on the use of mobile and smart technology. Amongst other things this will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school or college, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. Schools and colleges should carefully consider how this is managed on their premises and reflect in their mobile and smart technology policy and their child protection policy.		🟥☐ 🟨☐ 🟩☒
Remote learning 127. Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. The NSPCC and PSHE Association also provide helpful advice: • NSPCC Learning - Undertaking remote teaching safely during school closures; • PSHE - PSHE Association coronavirus hub.	We have a remote learning policy	🟥☐ 🟨☐ 🟩☒

Filters and monitoring 128. Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs risks.		☐ 🟥 ☐ 🟨 ☒ 🟩
129. The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. [33] The UK Safer Internet Centre has published guidance as to what "appropriate" filtering and monitoring might look like: UK Safer Internet Centre: appropriate filtering and monitoring. [33] The Prevent duty Departmental advice for schools and childcare providers and Prevent Duty Guidance For Further Education Institutions.		☐ 🟥 ☐ 🟨 ☒ 🟩
130. Support for schools when considering what to buy and how to buy it is available via the: schools' buying strategy with specific advice on procurement here: buying for schools.		☐ 🟥 ☐ 🟨 ☒ 🟩

Information security and access management 131. Education settings are directly responsible for ensuring they have the appropriate level of security protection procedures in place, in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network. In addition, broader guidance on cyber security including considerations for governors and trustees can be found at NCSC.GOV.UK.		🟥☐ 🟨☐ 🟩☒
Reviewing online safety 132. Technology, and risks and harms related to it evolve and changes rapidly. Schools and colleges should consider carrying out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. A free online safety self-review tool for schools can be found via the 360 safe website.		🟥☐ 🟨☐ 🟩☒
133. UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.		🟥☐ 🟨☐ 🟩☒
134. When reviewing online safety provision, the UKCIS external visitors guidance highlights a range of resources which can support educational settings to develop a whole school approach towards online safety.		🟥☐ 🟨☐ 🟩☒

Information and support 135. There is a wealth of additional information available to support schools, colleges and parents to keep children safe online. A sample is provided at Annex D.		☐ 🔴 ☐ 🟡 ☒ 🟢
Inspection 136. Since September 2019, Ofsted's inspections of early years, schools and post-16 provision are carried out under: Ofsted's Education Inspection Framework. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.		☐ 🔴 ☐ 🟡 ☒ 🟢
137. In addition to the framework and inspections handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: Inspecting safeguarding in early years, education and skills settings.		☐ 🔴 ☐ 🟡 ☒ 🟢
138. The Independent Schools Inspectorate (ISI) is approved to inspect certain independent schools and will also report on safeguarding arrangements. ISI has a published framework which informs how it inspects at Independent Schools Inspectorate.		☐ 🔴 ☐ 🟡 ☒ 🟢
What school and college staff should do if they have a safeguarding concern, or an allegation is made about another staff member 139. Governing bodies and proprietors should ensure there are procedures in place (as described in paragraph 74) to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers and contractors).		☐ 🔴 ☐ 🟡 ☒ 🟢

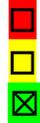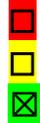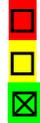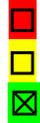|		
140. Concerns and allegations that may meet the harms test should be addressed as set out in Section one of Part four of this guidance.		🟥 ☐ 🟨 ☐ 🟩 ☒
141. 'Lower level' concerns and allegations that do not meet the harms test should be addressed as set out in Section two of Part four of this guidance.		🟥 ☐ 🟨 ☐ 🟩 ☒
142. There **must** be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. [34] ***This is a legal duty and failure to refer when the criteria are met is a criminal offence***. [35] More detail is provided at paragraph 329. [34] Section 35 of the Safeguarding Vulnerable Groups Act 2006. [35] Section 38 of the Safeguarding Vulnerable Groups Act 2006.		🟥 ☐ 🟨 ☐ 🟩 ☒
143. Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they **must** consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.		🟥 ☐ 🟨 ☐ 🟩 ☒
Peer on peer /child on child abuse 144. **All** staff should recognise that children are capable of abusing their peers (including online). **All** staff should be clear about their school's or college's policy and procedures with regard to peer on peer abuse.		🟥 ☐ 🟨 ☐ 🟩 ☒

145.

Governing bodies and proprietors should ensure that their child protection policy includes:

- Procedures to minimise the risk of peer on peer abuse;
- The systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously;
- How allegations of peer on peer abuse will be recorded, investigated and dealt with;
- Clear processes as to how victims, perpetrators and any other children affected by peer on peer abuse will be supported;
- A recognition that even if there are no reported cases of peer on peer abuse, such abuse may still be taking place and is simply not being reported;
- A statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children;
- Recognition that it is more likely that girls will be victims and boys' perpetrators, but that all peer on peer abuse is unacceptable and will be taken seriously; and
- The different forms peer on peer abuse can take, such as:
  - o Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - o Abuse in intimate personal relationships between peers;

- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence and sexual harassment. Part five of this guidance and [Sexual violence and sexual harassment between children in schools and colleges sets out how schools and colleges](#) should respond to reports of sexual violence and sexual harassment;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos [36] (also known as sexting or youth produced sexual imagery): the policy should include the school or college's approach to it. The Department provides [Searching Screening and Confiscation Advice](#) for schools. The UKCIS Education Group has published [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) which outlines how to respond to an incident of nudes and semi-nudes being shared;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Upskirting (which is a criminal offence [37]), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- Initiation/hazing type violence and rituals.

[36] Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos. [37] Voyeurism (Offences) Act 2019 (legislation.gov.uk)		
The use of 'reasonable force' in schools and colleges 150. There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.		🟥 🟨 🟩⊠
151. The Department believes that the adoption of a 'no contact' policy at a school or college can leave staff unable to fully support and protect their pupils and students. It encourages headteachers, principals, governing bodies, and proprietors to adopt sensible policies, which allow and support their staff to make appropriate physical contact. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances.		🟥 🟨 🟩⊠

152. When using reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities (SEND), mental health or with medical conditions, schools and colleges should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 [39] in relation to making reasonable adjustments, non- discrimination and their Public Sector Equality Duty. [40] By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force. [39] Advice for Schools and Advice for Further and Higher Education. [40] Compliance with the Public Sector Equality Duty (PSED) is a legal requirement for schools and colleges that are public bodies. The Equality and Human Rights Commission provides the following general guidance for schools that are subject to the PSED.		🟥☐ 🟨☐ 🟩☒
153. Departmental advice for schools is available at Use of Reasonable Force in Schools.		🟥☐ 🟨☐ 🟩☒
154. For information about how to support children with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention can be found at Reducing the need for restraint and restrictive intervention.		🟥☐ 🟨☐ 🟩☒
Use of school or college premises for non-school/college activities	All staff have DBS checks	🟥☐ 🟨☐ 🟩☒

155. Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.		
156. When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.		🟥☐ 🟨☐ 🟩☒
Alternative provision 157. The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to.	N./A	🟥☐ 🟨☐ 🟩☐
158. The Department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:	N/A	🟥☐ 🟨☐ 🟩☐

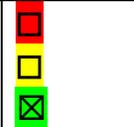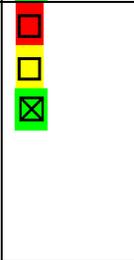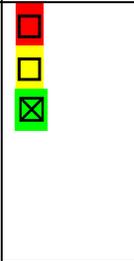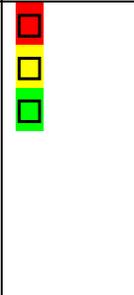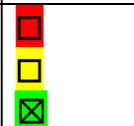|		
• [Alternative provision - DfE Statutory Guidance](#); and • [Education for children with health needs who cannot attend school - DfE Statutory Guidance](#).		
Children potentially at greater risk of harm 159. Whilst **all** children should be protected, it is important that governing bodies and proprietors recognise (and reflect in their policies and procedures) some groups of children are potentially at greater risk of harm.		🟥 🟨 🟩☒
Children who need a social worker (Child in Need and Child Protection Plans) 160. Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.		🟥 🟨 🟩☒
161. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.		🟥. 🟨 🟩☒
162.	All unauthorised absences are shared with social worker	🟥

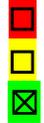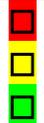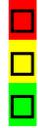|		
Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).		☐ ☒
163. Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.		☐ ☐ ☒

Children missing from education

164. Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. It is important the school or college's response to children missing from education supports identifying such abuse and also helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- Schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points can be found in the Department's statutory guidance: Children Missing Education;
- Further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges;
- General information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy.

Elective Home Education (EHE) 165. Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.	N/A	🟥 🟨 🟩
166. From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll [41]. [41] This requirement does not apply where a pupil's name is deleted after they have completed the final year at the school (e.g. Year 6 at a typical primary school) unless the local authority have asked to be informed about such deletions.	N/A	🟥 🟨 🟩
167. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. 168. DfE guidance for local authorities on Elective home education sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.	N/A	🟥 🟨 🟩

Children requiring mental health support 169. Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils.		🟥☐ 🟨☐ 🟩☒
170. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Governing bodies and proprietors should ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.		🟥☐ 🟨☐ 🟩☒
171. The Department is providing funding to support costs of a significant training program for senior mental health leads and the national rollout of the Link Program. Training for senior mental health leads, will be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health.	Head teacher has completed training	🟥☐ 🟨☐ 🟩☒
172. The Department has published advice and guidance on Preventing and Tackling Bullying, Mental Health and Behavior in Schools (which may also be useful for colleges). The Mental Health and Behavior in Schools guidance sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their pupils.		🟥☐ 🟨☐ 🟩☐
173. The senior mental health lead role is not mandatory and different senior leads will inevitably have different levels of knowledge and skills to promote wellbeing and mental health, and		🟥☐ 🟨☐ 🟩☒

different responsibilities, as roles are locally defined to fit in with other relevant roles and responsibilities. However, we expect a senior mental health lead in a school/college will be a member of, or supported by the senior leadership team, and could be the pastoral lead, SENCO, or designated safeguarding lead. We are aware most schools and colleges already have a senior mental health lead in place.		
174. From September 2021, up to 7,800 schools and colleges will be able to access senior mental health leads training. Settings will have the opportunity to opt-in for a fixed value grant and will be supported to identify the most appropriate learning from a list of quality assured courses. Settings ready to develop or introduce their whole school or college approach to mental health and wellbeing, with capacity to undertake training before March 2022, will be encouraged to apply. Further information on how schools and colleges can do this - and how they can identify and book the most appropriate training for them - will be provided nearer the time.		🟥 🟨 ☒🟩
175. In addition, Public Health England has produced a range of resources to support secondary schools to promote positive health, wellbeing and resilience among children including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans. The Department has also published, 'Every interaction matters', a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our Wellbeing for education	N/A	🟥 🟨 🟩

recovery program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.		
Looked after children and previously looked after children 176. The most common reason for children becoming looked after [42] is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding to keep looked after children safe.	N/A	🟥 🟨 🟩
177. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead [43] should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. [42] A child who is looked after by a local authority (referred to as a looked-after-child) as defined in section 22 Children Act 1989, means a child who is subject to a care order (interim or full care order) or who is voluntarily accommodated by the local authority. [43] In maintained schools and academies the designated safeguarding lead should work closely with the designated teacher.	N/A	🟥 🟨 🟩
178. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is	N/A	🟥 🟨 🟩

important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.		

The designated teacher

179. Governing bodies of maintained schools and proprietors of academies **must** appoint a designated teacher [44] and should work with local authorities to promote the educational achievement of registered pupils who are looked after. With the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. [45] The designated teacher **must** have appropriate training and the relevant qualifications and experience. [46] In other schools and colleges, an appropriately trained teacher should take the lead.
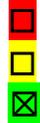
[44] Section 20 of the Children and Young Persons Act 2008 sets this requirement for maintained schools. This legislation and accompanying statutory guidance on the role of designated teacher applies to academies through their funding agreements.

[45] For the purposes of the role of the virtual school head and designated teacher, under the Children and Social Work Act 2017, previously looked-after children are those who: are no longer looked after by a local authority in England and Wales (as defined by the Children Act 1989 or Part 6 of the Social Services and Well-being (Wales) Act 2014) because they are the subject of an adoption, special guardianship or child arrangements order; or were adopted from 'state care' outside England and Wales.

[46] Section 20(3) of the Children and Young Persons Act 2008 and regulation 3 of the Designated Teacher (Looked- After Pupils etc) (England) Regulations 2009.

180. Statutory guidance contains further information on The Role and Responsibilities of the Designated Teacher.

☐ (red)
☐ (yellow)
☒ (green)

Virtual school heads 181. Virtual school heads [47] manage pupil premium plus for looked after children;[48] they receive this funding based on the latest published number of children looked after by the local authority. In maintained schools and academies, the designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. [49] The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children. In other schools and colleges, an appropriately trained teacher should take the lead. [47] Section 22(3B) of the Children Act 1989 requires local authorities in England to appoint at least one person for the purpose of discharging the local authority's duty to promote the educational achievement of its looked after children. That person (known as the virtual school head) must be an officer employed by the authority or another local authority in England. [48] Pupil premium plus for previously looked after children is managed by their school. [49] All looked after children must have a personal education plan (PEP). This is part of the care plan that the local authority looking after the child must have in place and review regularly.	All audits are completed and data sent to virtual school	🟥 🟨 🟩☒
182. As with designated teachers, following the commencement of sections 4 to 6 of the Children and Social Work Act 2017, virtual school heads have responsibilities towards children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales. Their primary role for this group will be the provision of information and advice to relevant parties.[50]		🟥 🟨 🟩☒

[50] Any person that has parental responsibility for the child; providers of funded early years education, designated teachers for previously looked-after children in maintained schools and academies, and any other person the authority considers appropriate for promoting the educational achievement of relevant children. 183. Statutory guidance on Promoting the Education of Looked After Children contains further information on the roles and responsibilities of virtual school heads.		

Care leavers 184. Local authorities have on-going responsibilities to the children who cease to be looked after and become care leavers. [51] That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. Designated safeguarding leads should therefore have details of the local authority Personal Advisor appointed to guide and support the care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver. [51] A care leaver who is 16 or 17 (referred to in legislation as a 'relevant child' is defined in section 23A(2) of the Children Act 1989 as a child who is (a) not looked after (b) aged 16 or 17, and (c) was, before ceasing to be looked after by a local authority, looked after for a period of 13 weeks, or periods amounting in total to 13 weeks, beginning after s/he reached the age of 14 and ended after s/he reached the age of 16.	N/A	🟥 🟨 🟩

Children with special educational needs and disabilities or physical health issues 185. Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include: • Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; • These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; • The potential for children with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and • Communication barriers and difficulties in managing or reporting these challenges.		🟥 ☐ 🟨 ☐ 🟩 ☒
186. Governing bodies and proprietors, should, therefore ensure that their child protection policy reflects the above and to address these additional challenges, schools and colleges should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.		🟥 ☐ 🟨 ☐ 🟩 ☒

187. Further information can be found in the Department's: [SEND Code of Practice 0 to 25 and Supporting Pupils at School with Medical Conditions](#).	

<table>
<tr><td colspan="2" style="background-color:olive">Action Plan for PART TWO, the management of safeguarding Annual Safeguarding Practice Audit 2022 - 2023</td></tr>
</table>

RED	Unable to evidence that safeguarding duties are being met in this area of practice. immediate development needed to implement.
AMBER	Some evidence of safeguarding duties not being met, therefore immediate development is required to improve this.
GREEN	Clear evidence of safeguarding duties being met.

Safeguarding practice area	What needs to change and how	RAG RATE
Tracking training	**Use Arbor to track training and ensure everything is up to date.**	

Date of audit	Name of author	Date to review
June 2023	**Anja Tyler**	**June 2025**