



Department  
for Education

# **Keeping children safe in education**

**Government response to consultation**

**May 2016**

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## Introduction

On 22 December 2015, the Department for Education published a consultation on proposed changes to the statutory guidance for schools and colleges in England- Keeping children safe in education. The consultation took place online, with the opportunity to also respond by email or letter.

The proposed changes primarily impact Parts one and two of the guidance (and associated Annexes).

We have made a number of changes to Part three, which are, in the main, factual or drafting changes. Full details are given on page 26. Further consideration will be given to determine whether Parts three and four of the guidance would benefit from further revision and, if so, these matters will be consulted on separately.

We have published at: [Keeping children safe in education](#) a draft of the revised guidance. This is **for information** so schools and colleges can plan for the commencement of the guidance on 5 September 2016. Please note the various placeholders in the guidance: these reflect changes we are waiting to confirm over the summer and will be updated accordingly to ensure the revised guidance is as up to date and accurate as possible when it commences on 5 September 2016.

**Until the new guidance commences on 5 September 2016 the existing statutory guidance- [Keeping children safe in education July 2015](#) is still in force and is what schools and colleges must continue to have regard to.**

The consultation ran for 8 weeks until 16 February 2016.

Of the 310 responses we received:

- 124 were from headteachers or school leaders
- 36 were from Local Authorities
- 21 were from teachers
- 19 from national representative organisations (including Unions)
- 13 were submitted from parents or carers
- 6 from schools governors
- 93 responses were from other organisations <sup>1</sup>

A list of organisations which responded is at Annex A.

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<sup>1</sup> This included charities and respondents who did not classify themselves as being included in the other specified groups.

## Overview of changes to the guidance

The changes aim to strengthen the guidance so that all staff are clear as to their responsibilities in safeguarding children and know how to respond if they have concerns about the welfare of a child.

Main changes include:

- reinforcing the importance of Part one of the guidance as a starting point for **all** staff in schools and colleges to read and have mechanisms in place to support understanding;
- reducing the size of Part one so the more detailed additional safeguarding information can be targeted at those staff who work directly with children;
- increasing the focus on the importance of a child-centred and coordinated response to safeguarding;
- emphasising further the role that individual staff play in safeguarding and the fact that it is everyone's responsibility;
- highlighting the importance of early help and how it sits in the wider safeguarding system;
- clarifying the difference between a concern and a child in immediate danger and the required action in each case;
- inserting a new requirement into the guidance to ensure staff are regularly updated on safeguarding and child protection, as required, but at least annually;
- clarifying confidentiality and moving it from Part two to Part one so that all staff will see it;
- updating information on whistleblowing, in particular signposting to the new NSPCC helpline;
- clarifying the role of the designated safeguarding lead and cover for the role; and
- inserting a new section to cover online safety, including the requirement in guidance for schools and colleges to have appropriate monitoring and filtering systems in place and an annex to support schools and colleges.

## **Summary of responses received and the government's response to the consultation**

This sets out the views that we have received in response to the consultation on changes to the Keeping children safe in education statutory guidance (“the guidance”). It also sets out the decisions that have been taken when revising this guidance.

The responses have been important in shaping and strengthening the guidance and we are grateful to the respondents for sharing their views.

Some respondents chose only to answer a subset of the questions that were asked. Therefore, response figures for each question differ depending on which questions respondents answered. For example, there were 287 responses to our question on whether staff should not only read Part one of the guidance but also understand it whereas there were 237 responses to the question about frequency of current staff training. Throughout the response document, percentages are expressed as a measure of those answering each question, not as a measure of all responses.

This analysis does not include issues raised which were outside the scope of the consultation.

## Summary

The summary section in the guidance sets out the legal background and to whom the guidance is applicable. Set out below are the responses we received on the proposals to strengthen the guidance so that governing bodies, proprietors and management committees should not only ensure that all of their staff read, but also *understand at least Part one* of the guidance and whether this change would result in changes to school processes or procedures. It also sets out the government's response to the consultation on this issue.

### Requirement to ensure staff read and understand at least Part one of the guidance

**We received 287 responses on whether governing bodies, proprietors and management committees should be required to ensure that all staff should not only read, but also understand, at least Part one of the guidance.**

Should all staff be required not only to read at least Part one but also understand it?	Total	Percent
Yes:	226	79%
No:	41	14%
Do not know:	20	7%

Major themes:

- how to quantify staff's understanding of Part one (35 % of respondents); and
- understanding of Part one is essential (15% of respondents)

Respondents noted that reading the guidance without understanding is no more than a "tick box" exercise and understanding is essential so that staff can fulfil their safeguarding responsibilities. However, while the majority of respondents were supportive of this change, there were concerns about how this understanding could be demonstrated, not least at inspection, and the action to take when staff did not understand what was required of them under Part one. While some respondents queried whether some type of testing would be required to assess understanding, others stated that they were already using case studies, online testing and question and answer sessions to monitor understanding.

## Changes to process or policy if staff have to “understand” Part one

We received 257 responses on whether the proposed emphasis on understanding of Part one will lead to changes to processes or procedures.

Will the emphasis on understanding lead to you changing process or procedure in your school?	Total	Percent
Yes:	132	51%
No:	79	31%
Do not know:	46	18%

Major themes:

- whether some form of testing of staff would be required to measure understanding (33 % of respondents);
- no changes would be required (7% of respondents); and
- changes to staff training would be required (5% of respondents)

## Government response to consultation on proposed requirement to ensure understanding of Part one

It was pleasing that so many respondents agreed that the guidance should be strengthened so that staff are required to understand at least Part one. 51% of respondents said that this would result in them needing to change policy or procedure within their schools.

The main concern was how schools and colleges would be expected to demonstrate that their staff had understood Part one and whether some form of testing would be required. We do not wish to impose unnecessary testing and associated costs on schools and colleges or create a Part one testing industry. However we want to ensure that reading Part one should be more than a tick box exercise and that all staff should be comfortable with their role in safeguarding. Therefore, we have stated in the revised guidance that schools and colleges have appropriate mechanisms in place to assist staff to understand and discharge their roles and responsibilities as set out in Part one. This is rather than having to ensure understanding. How to do this is entirely a matter for schools and colleges. The assumption would be that the designated safeguarding lead might (if they do not already) play a leading role.

## Part one of the guidance

Part one provides background information on the broader safeguarding environment in which all schools and colleges operate. It provides detailed information for all staff on what they should know, what they should look out for and what they should do if they have a safeguarding concern about a child, a staff member or safeguarding practices. All staff should read this part.

### The role of school and college staff

**We received 291 responses on whether the additions to this section make it clear that safeguarding is everyone’s responsibility.**

<b>Does “The role of school and college staff” make clear that safeguarding is everyone’s responsibility?</b>	<b>Total</b>	<b>Percent</b>
Yes:	259	89%
No:	22	8%
Do not know:	10	3%

Major themes:

- that the additions made it very clear that everyone is responsible for safeguarding (12% of respondents); and
- the scope of who is responsible for safeguarding is still not clear (7%)

Respondents who felt that the section was now very clear on responsibilities welcomed the re-emphasis. Those who felt the guidance was still not specific enough about who was responsible for safeguarding cited the role of non-teaching staff employed in the school environment, such as domestic and catering staff.

## What school and college staff should do if they have concerns about a child

We received 278 responses on the question of whether the changes to this section provide a simple and easy to follow message with regards to referrals.

Does “What school and college staff should do if they have concerns about a child” provide a simple and easy to follow message with regards to referrals?	Total	Percent
Yes:	232	83%
No:	32	12%
Do not know:	14	5%

Major themes:

- the guidance is now very helpful in setting out the actions to be taken (8% of respondents);
- the emphasis on early help<sup>2</sup> is welcome (6% of respondents); and
- there is an apparent conflict between paragraph 10 which states that anyone concerned about a child’s welfare should ensure a referral is made to children’s social care and paragraph 19, which states in most instances the designated safeguarding lead should make the referral (6% of respondents)

Respondents generally felt that the message about what to do if there is a concern about a child was streamlined, clear and supportive. The guidance on early help and the distinction between what to do if there is concern for a child rather than a child in immediate danger was well received.

Some respondents felt that more clarity was needed about who should make the referral and what the process should be if the person making the referral was not the designated safeguarding lead.

## New flow chart setting out process to be followed by staff when they have concerns about a child

We received 281 responses on whether the new flow chart is an improvement on the flow chart in the existing guidance.

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<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years through to the teenage years

Is the new flow chart an improvement on the previous flow chart?	Total	Percent
Yes:	193	69%
Do not know:	45	16%
No:	43	15%

Major themes:

- the flow chart is clear (12% of respondents);
- the flow chart is too detailed (9% of respondents); and
- the font and background colours present difficulties for readers with visual impairments (4%)

Respondents were generally in favour of the changes to the flow chart, with positive responses such as it is easy to follow and that respondents will issue it as a separate document. Others felt that it was unnecessarily complex and gave too much detail, although some felt the inclusion of links to other guidance would be helpful.

## Increasing the effectiveness of Part one

We asked an open question to assess what changes respondents would propose to increase the effectiveness of Part one.

**We received 43 responses on proposed changes to increase the effectiveness of Part one. The most frequent comments are listed in the table below.**

What changes would you propose to improve the effectiveness of Part one?	Total	Percent
Keep it simple/provide checklists	21	49%
More information on indicators of abuse	7	16%
Information on protection for whistle blowers	4	9%
Information on the role of the deputy designated safeguarding lead	5	12%
Safeguarding children in home education	3	7%
The role of governors	3	7%

The main issue for respondents was that Part one should remain as simple and concise as possible to encourage staff to read it.

## Publishing Part one as a standalone document

We received 271 responses on whether publishing Part one as a standalone document is helpful.

Does it help to publish Part one as a standalone document?	Total	Percent
Yes:	206	76%
No:	37	14%
Do not know:	28	10%

Major themes:

- publishing it as a standalone document makes it more accessible to staff (26%); and
- publishing it as a standalone document reduces the impact of the guidance as a whole (9%)

Respondents believed that the standalone document makes Part one more accessible as it covers what the majority of staff need to know and some said they use it as an introduction to safeguarding. Others said issuing Part one in the form of a small booklet or in an abbreviated form which staff could carry with them is useful, although using a paper copy would lose the links to other online guidance. The concerns about the standalone document were that it leads to a narrow view of the guidance and staff are not encouraged to read the full guidance.

## Effect of changes to Part one on safeguarding policies and procedures

We received 254 responses about whether the proposed changes to Part one will require schools to amend their safeguarding policies and procedures.

Will the proposed changes to Part one require you to adjust your safeguarding policies and procedures	Total	Percent
Yes:	129	51%
No:	82	32%
Do not know:	43	17%

Major themes:

- amendments to policy content (20% of respondents);
- take steps to ensure staff understand Part one (13% of respondents); and
- amendments to training (6% of respondents)

Respondents' main concerns were that they would need to amend and update their safeguarding policies. The proportion of respondents who did not know whether they would need to adapt their policies and procedures is relatively high. This could be because some respondents who are not directly involved with schools have answered the question in this manner.

## **Government response to consultation on proposed changes to Part one of the guidance**

Although we recognise that members of the teaching staff are probably the most likely to identify children at risk, we have emphasised by the use of bold type that **all** staff have a role to play in safeguarding and that **all** staff have a responsibility to provide a safe learning environment. Clearly the role will vary depending on the level of interaction a staff member has with children and the school or college's policies and training will reflect this. If in any doubt, schools and colleges should always err on the side of caution and assume that the person in question will have a role to play in safeguarding and provide them with the required training and knowledge proportional to their role.

We have simplified paragraph 10 and cross referred it to paragraphs 21-27.

We have acted on a number of suggestions, such as to move information on confidentiality from Part two to Part one so all staff will see it.

Whilst the keeping of written records is something schools and colleges already do, we have listened to respondents and made it explicit in Part one.

We are pleased that the majority of respondents felt that the flow chart is an improvement. While some respondents felt that it was too complex and should be restricted solely to the action required by school staff, we believe that it is important to demonstrate the whole process, particularly as the referring member of staff may need to work closely with the other agencies involved. We have acted on concerns about the colours used in the flow chart and have amended these appropriately.

The majority of respondents agree that there is merit in publishing Part one as a standalone document. As such, we will continue to publish Part one in this way.

One of the most frequent comments from respondents was that Part one is too large and detailed for all staff to read. We agree that Part one needs to be a simple introduction to safeguarding for all staff, focussing on the key issues: safeguarding is everyone's responsibility; everyone needs to be aware of what abuse and neglect can look like; everyone needs to know how to escalate a concern about a child; everyone needs to know how to escalate a concern regarding a staff member and everyone needs to know how to escalate concerns about safeguarding within the institution. To make Part one a more manageable source of information, we have created a "Specific Safeguarding Issues"- Annex A, so that the information is still available but can be targeted at appropriate staff who work directly with children. It is a matter for individual schools and colleges to decide who is classed as working directly with children and if they would benefit from reading the additional information. If in any doubt, schools and colleges should always err on the side of caution. A local decision on this matter will be much more effective than DfE trying to provide a list of job roles that should read Annex A.

## Part two of the guidance

Part two sets out the responsibilities of the governing body, proprietor and management committee of a school or college. Therefore, it is targeted mainly at members of these bodies and the senior leaders who will, in many cases, be responsible for the day to day management of safeguarding.

### Clarification of cover arrangements for the designated safeguarding lead

**We received 262 responses about the clarity of the cover arrangements for the designated safeguarding lead.**

Is the guidance clear as to cover arrangements for the designated safeguarding lead?	Total	Percent
Yes:	211	81%
No:	36	14%
Do not know:	15	6%

Major themes:

- concerns about the availability of the deputy designated safeguarding lead (14% of respondents);
- training requirements for the deputy designated safeguarding lead (11% of respondents); and
- the seniority of the person nominated as deputy designated safeguarding lead (3% of respondents)

While the majority of respondents were content with the clarity of this section, others raised concerns about what would constitute “cover”, e.g. would the staff members need to be on site or would being “contactable” suffice? Examples were cited of situations where the designated safeguarding lead and the person nominated as deputy could both be away from the school. This was particularly relevant for cover for after school clubs and activities and also for smaller schools. It was recognised that the deputy should be trained to the same standard as the designated safeguarding lead.

### Annual training for the designated safeguarding lead

**We received 282 responses on the question of annual training as a minimum for the designated safeguarding lead.**

Should the designated safeguarding lead training be provided annually – as a minimum?	Total	Percent
Yes:	182	65%
No:	69	24%
Do not know:	31	11%

Major themes:

- concerns about what constitutes training (18% of respondents);
- at least annual training is essential (17% of respondents);
- concerns about the cost and resource implications (13% of respondents);
- training every two years with regular updates is adequate (11% of respondents); and
- the risk of frequent training leading to disengagement (10% of respondents)

While the majority of respondents agreed with the theory of annual training, with some respondents citing the speed of change of online safety issues as a particular concern, others felt that the important issue was the quality and relevance of the training. Some respondents felt that annual training would become no more than a tick box exercise and repeating the same material would result in disengagement. From the response to a later question, it is obvious that most schools and colleges have safeguarding as a standing agenda item at staff meetings, are issuing regular updates and discussing the issues raised.

## Increased frequency of training

**We received 264 responses on the question of whether introducing annual training for staff would result in schools having to provide more frequent training.**

Would introducing annual training for staff result in you having to provide more frequent training?	Total	Percent
Yes:	137	52%
No:	90	34%
Do not know:	37	14%

Major themes:

- training would have to be provided more frequently (12% of respondents);

- annual training would create a resource issue (10% of respondents); and
- annual training is already provided (8% of respondents)

Just over half of respondents stated that this change to the guidance would result in them having to provide more frequent training for staff. However, from the response to the previous question, there appears to be different perceptions of what would constitute training and this may have affected the response. Some respondents felt that more frequent training would increase costs and create a staff resource issue, with difficulty obtaining places on externally provided training. Small schools could be more affected by the need to provide cover for staff on training.

## Frequency of current training

**We received 237 responses to the question of how often training is provided at present.**

How often do you provide training currently?	Total	Percent
More than once a year:	52	22%
Once a year:	54	23%
Once every two years:	50	21%
Other:	81	34%

Major themes:

- training is provided every 3 years (20% of respondents);
- regular updates are given to staff as required (19% of respondents);
- training is provided every 2 years (10% of respondents); and
- training is provided annually (8% of respondents)

A clear trend in the responses is that frequency of training depends on the role staff play in safeguarding within the school, with some respondents giving multiple responses regarding frequency.

## Expectation of use of appropriate online filters and monitoring systems

**We received 290 responses on the question of schools and colleges ensuring appropriate filters and monitoring systems are in place.**

<b>Is it reasonable to expect schools and colleges to ensure that they have appropriate online filters and monitoring systems in place to protect children from harmful online material?</b>	<b>Total</b>	<b>Percent</b>
Yes:	274	94%
No:	9	3%
Do not know:	7	2%

Major themes:

- there could be over-reliance on filtering and education on how to stay safe online is just as important (23% of respondents);
- agree with their use/already in use at my school (20% of respondents);
- recognition that it is possible to bypass filters (14% of respondents); and
- there is a risk of over-blocking of legitimate sites and monitoring must be proportional to the risk (12% of respondents)

While the response to expecting schools and colleges to have appropriate online filtering and monitoring systems was overwhelming positive, respondents were cautious about relying too much on these systems to keep children safe online. Mobile devices will generally be out of scope of schools' and colleges' filtering systems and it was recognised that pupils may legitimately be using their own devices in the classroom and certainly will be online outside of school. To overcome this, educating pupils about staying safe online was cited as just as important as the use of filtering and monitoring software by a high proportion of respondents. There is a risk of over-blocking of legitimate sites which pupils may be using to find educational material.

## **Online guidance on appropriate filtering and monitoring systems**

**We received 288 responses on the question of online guidance.**

<b>Would it help schools and colleges if online guidance/an online portal was created that set out what "appropriate" filters and monitoring systems look like and advice on how to satisfy themselves that they have them?</b>	<b>Total</b>	<b>Percent</b>
Yes:	250	87%
Do not know:	26	9%
No:	12	4%

Major themes:

- guidance would be helpful (27% of respondents);
- there should be flexibility to allow schools choice in the systems they use (5% of respondents); and
- the guidance/portal would need to be kept up to date (5% of respondents)

Respondents were generally in favour of guidance being provided, not least to ensure consistency and to assist schools who lacked expertise in filtering and monitoring. Other suggestions were that guidance would be helpful so that systems already in place could be assessed against a standard.

There were strong suggestions that schools should be allowed to choose what systems they used, particularly as responses to the previous question suggest that the majority of schools already have software in place.

## Ensuring teaching about safeguarding, including online safety

**We received 294 responses on the question of changing the emphasis with regards to teaching about safeguarding, including online.**

<b>Is it reasonable to change the emphasis from “should consider” to “should ensure” with regards to teaching about safeguarding, including online?</b>	<b>Total</b>	<b>Percent</b>
Yes:	268	91%
No:	16	5%
Do not know:	10	3%

Major themes:

- the change of emphasis to “should ensure” is reasonable (15% of respondents);
- the wording should be “must ensure” (8% of respondents); and
- guidance on what is safe would be helpful (2% of respondents)

Respondents were overwhelmingly positive with regards to this change. Where respondents did not think the emphasis should change to “should ensure” from “should consider”, this was generally because of one of two reasons: either that schools should be allowed to use their professional judgement to decide what should be taught or that “should ensure” did not go far enough and “must ensure” would be preferable.

## Increased costs if schools “should ensure” teaching about safeguarding

We received 283 responses on the question of increased costs.

Will the change in emphasis from “should consider” to “should ensure” lead to an increase in costs?	Total	Percent
Do not know:	106	37%
No:	90	32%
Yes:	87	31%

Major themes:

- more resource would be needed (18% of respondents);
- already in place, no additional costs (12% of respondents); and
- child safety is more important than the costs involved (4% of respondents)

Those who thought costs would increase cited the need to buy in training and create extra training materials. Others said that it was already in place or should be taught as part of existing lessons.

## Help to develop peer on peer abuse policies and procedures

We asked an open question about what would be helpful in developing peer on peer abuse policies.

We received 131 responses and the most common comments are listed in the table below.

What, if any, information would help governing bodies and proprietors develop appropriate peer on peer abuse policies and procedures?	Total	Percent
Examples/case studies/model policies:	82	63%
Specific guidance/what to look for:	34	26%
Consult/work with other agencies, including parents and young people:	24	18%
Emotional and legal implications:	14	11%
Statistics and data:	10	8%

The respondents were very positive that examples, case studies and model policies which they could adapt would be very helpful. A number said that specific guidance on what to look for, signs of peer on peer abuse and statistics on its prevalence would be appreciated. They recognised that they would need to work with outside agencies and a number cited consulting with parents and young people themselves. A number of respondents felt that help in how to understand the legal implications of such behaviours and the emotional effects of being either the victim or perpetrator would help.

Some respondents thought that separate policies and procedures on peer or peer abuse were unnecessary as incidents could be covered under existing anti-bullying policies.

## Improved effectiveness of Part two

We asked an open question about what changes would make Part two of the guidance more effective and received 20 responses. These are summarised in the table below.

What changes would you propose to improve the effectiveness of Part two	Total	Percent
More guidance for governors:	11	55%
Policy content:	10	50%

The majority of responses had been provided under the previous questions. The main issues raised were the need for training for governors and heads, the appropriate frequency and content of training for staff and the role of the designated safeguarding lead.

## Changes to policies and procedures following updates to Part two

We had 232 responses on the question of adjusting policies and procedures.

Will the proposed changes to Part two require you to adjust your safeguarding policies and procedures?	Total	Percent
Yes:	127	55%
Do not know:	55	24%
No:	50	22%

Major themes:

- changes to policies (16% of respondents); and
- more training or updates to training materials (13% of respondents)

Where changes to policies and procedures would need to be made, these were mainly around frequency of training. Many respondents said they would update their policies to take account of the new guidance.

## **Government response to consultation on proposed changes to Part two of the guidance**

### **Responsibility for safeguarding**

Working Together to Safeguard Children<sup>3</sup> says that schools and colleges should have a board level safeguarding lead. We have reflected this in Part two.

### **Safeguarding policies**

We listened to the helpful comments regarding our proposal to include “safeguarding policy” within the requirements. Our intention here was to make the guidance more comprehensive and support schools and colleges. On balance, the comments suggested including safeguarding policy alongside child protection policy would not be helpful and create confusion. As such we have removed this proposal. We are clear that child protection is part of the broader safeguarding approach and as such continue to refer to safeguarding in the guidance. What we are not doing is making a requirement for schools and colleges to have a safeguarding policy.

### **Cover for the designated safeguarding lead**

We have listened to respondents and updated the designated safeguarding lead section and the job description annex to clarify further the cover arrangements for the role, the options with regards to deputy designated safeguarding leads and to reiterate where the ultimate responsibility sits with regards to the role.

### **Frequency of training**

Whilst the majority of respondents welcomed an annual training requirement we have listened to the concerns regarding the costs and the potential dilution of the quality of the training if it is held too often. Our primary concern is that staff have the required

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<sup>3</sup> [Working together to safeguard children](#)

knowledge and skills to keep children safe. As such we have retained the requirement for training at induction and appropriate training which is regularly updated. As before, how often staff are trained is a matter for the school or college to decide (in line with advice from the Local Children’s Safeguarding Board). In addition we have included a requirement in the guidance that staff are updated regularly, but at least annually, on safeguarding and child protection to provide them with the relevant skills and knowledge to meet their responsibilities. Consultation responses suggest the majority of schools are already updating their staff in most case weekly, monthly or termly and as such this will not be a new or additional burden for most schools and colleges. On balance we think “updated regularly, as required, but at least annually” is a reasonable requirement in the guidance. It will provide an extra reminder for those schools and colleges that are not doing enough in this area to actively consider their plans and processes to ensure all staff have the skills and knowledge required to safeguard children effectively.

## Online safety

In view of the increasing dangers faced by children online, it is essential that online safety is reflected in the revised guidance. It is pleasing to see the overwhelming support (the strongest positive response in the consultation) for appropriate filtering and monitoring systems. However, there is recognition that no filter can block all undesirable material and we emphasise (in Annex C) the whole school approach that is best practice with regards to online safety. As stated above, several respondents raised concerns that filtering will prevent young people obtaining information on health and sexuality issues. It was never our intention to prevent access to age-appropriate educational materials and this is made clear in the guidance. As set out above there is a balance to be struck between appropriate filtering and monitoring of online activities in the school or college setting and the risks of not doing so.

Respondents were eager to receive further guidance about what systems for filtering and monitoring should look like so that they were well informed and able to assess the systems on offer. The UK Safer Internet Centre has developed guidance on what appropriate filtering and monitoring systems might look like.<sup>4</sup> However, we agree that schools should be allowed to determine for themselves what is “appropriate” in terms of filtering and monitoring based on the size and type of the school, age of the pupils, use of IT and the costs involved. The most important consideration is that the measures taken are proportionate to the risks.

The vast majority of respondents agreed that changing the emphasis to “should ensure” teaching about safeguarding and online safety was reasonable.

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<sup>4</sup> [UK Safer Internet Centre](#)

The response to the question of whether changing the emphasis to “should ensure” would increase costs was the least clear cut of all the questions in this consultation. The number of respondents who were not sure whether costs would increase is relatively high. This could be because they are waiting to see what is required under the new guidance or because they are not directly involved in schools and have answered this way because they do not know what effect it will have on schools’ costs.

We are clear that the content of any teaching is a matter for the school. The important point is a decision is actively being made by the school or college to consider and teach something on safeguarding. What this is, how often it is taught and in what way it is taught is a matter for the school or college. This should be a decision for the school or college based on local circumstances and requirements. We would expect that the designated safeguarding lead might have a role to play in this process and there is a wealth of freely available and accessible information online (some of which is highlighted in the guidance) that will support schools and colleges.

### **Safer recruitment**

Our proposals to “tidy up” this section and make it clearer, on balance, were not generally supported. As such we have reverted to the original drafting.

### **Peer on peer abuse policies**

We are grateful for respondents’ views on how to develop effective peer on peer abuse policies. We have provided more information in Parts one and two. However, while many would appreciate case studies and model policies, this falls outside the scope of the current guidance. We are considering the very helpful response and deciding what, if anything, we can do to support schools and colleges.

## Comments on the changes to the Annexes

This was an open question and we had 37 responses, summarised in the table below.

Comments on the Annexes	Total	Percent
Annex C content should be clearer	25	68%
Annex F is a useful summary	16	43%

We did not specifically consult on changes to the Annexes but the views received were welcome. Most of the comments were around Annex A (now Annex B), Annex C (now Annex E) and Annex F (Now Annex H). Suggestions for Annex A included the need for more clarity on the seniority required with regards to the designated safeguarding lead with a clear job description for the role. Annex C comments raised concerns about whether host families participating in exchange visits should need Disclosure and Barring Service checks when this is not asked of their peers abroad and also suggested making a greater distinction between hosting exchange visits and a more long term private fostering arrangement. Annex F was particularly well-received, with respondents finding it very helpful as a summary of the changes.

## Part three of the guidance

In addition to the change to Part three that we consulted on reflecting section 128 checks, we are making additional changes to Part three to reflect that schools and colleges are now able to use the Teacher Services' system to check for restrictions or sanctions imposed on teachers by European Economic Area professional regulators. These checks support schools and colleges in carrying out their duty to make 'further checks on any person who has lived or worked outside of the UK that they consider appropriate', helping schools and colleges to make better informed decisions on a person's suitability to take up a staff position. We have also made a number of changes to clarify various points with regards to DBS checks. We have only made these changes where we think it would be helpful to do so. As we did not consult on major changes to Part 3 we have tried to keep such changes to a minimum.

## Conclusion

We are grateful to all those who took the time to respond to the consultation and share their views. We believe that the changes and refinements we have made to the guidance in response to the consultation will provide children with the high quality safeguarding in schools and colleges they deserve.

## Annex A: List of organisations which responded to the consultation<sup>5</sup>

3BM

Abbey Park Middle School, Pershore  
Albany Junior School, Stapleford  
Ashford School  
Association of Colleges  
Association of School and College Leaders  
Association of Teachers and Lecturers  
Austin Friars School, Cumbria  
Baines' Endowed Primary School, Blackpool  
Barrow 6<sup>th</sup> Form College  
Beaconsfield High School  
Bede's School  
Bedford Girls' School  
Beech Academy  
Berkhamsted Schools Group  
Birmingham City Council and Children's Safeguarding Board  
Bishop Stopford School, Kettering  
Bishops Itchington School, Southam  
Blessed William Howard Catholic School, Stafford  
Board of Deputies of British Jews  
Boarding Schools Association  
Bristol Grammar School  
Broadway and Towerview Playschool  
Buckinghamshire County Council  
Bute House Prep School for Girls, Hammersmith  
Camden Supplementary School Link  
Canford School, Canford Magna  
Catholic Education Service  
Catshill Learning Partnerships  
CEDF  
CensorNet Ltd  
Child Protection in Education  
Chinthurst School, Tadworth  
Chiseldon Primary School, Swindon  
Christ Church Academy, Stone  
Christchurch Cockfosters  
Codsall Community High School  
College of West Anglia, Kings Lynn

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<sup>5</sup> We had further responses from organisations but if the respondent had not indicated that he/she was responding on behalf of the organisation or included the name/address of the organisation, we have excluded them from this list. Likewise, we have not listed the names of private individuals who replied. However, these views were included in the analysis. We also had some respondents who did not answer the specific questions in the consultation or responded after the consultation closed. Although these responses were not included in the formal consultation analysis, they were read and the views therein taken into account when shaping the revised guidance.

Coombe Girls' School  
Cornwall Council Education, Health & Social Care, Learning & Achievement Service  
Costock CoE Primary School  
Craven College, Skipton  
Deafax  
Denefield School  
Department of Health  
Derby Safeguarding Children Board  
Devon County Council  
Dover College  
Durham High School for Girls  
East Riding College, Beverley  
Edgbaston High School for Girls  
Education Safeguarding  
Education Welfare Somerset  
End Violence Against Women Coalition  
Faber Catholic Primary School, Stoke on Trent  
Farnham Heath End School  
FASNA  
Focus Learning Trust  
Fordingbridge Infant School  
Forest School, Wokingham  
Forres Sandle Manor School, Fordingbridge  
Fulford Primary School  
Gateford Park Primary School, Worksop  
Gateways School, Harewood  
Girls' Schools Association  
Goldsworth Primary School, Woking  
Hackney Learning Trust  
Hampshire County Council  
Harpur Trust  
Harrow School  
Havering School Improvement Service  
Headington Prep School  
Headington School  
House Schools Group  
Kings' High School, Warwick  
Hull City Council  
Hurstpierpoint College Ltd  
IAPS  
ICT4Colloberation/YHGfL  
Image in Action  
Independent Schools Inspectorate  
Independent Schools' Council  
Isle of Wight Local Authority  
Iver Heath Infant School and Nursery  
Iver Heath Junior School  
Keble Prep School, Wades Hill  
Kedleston Schools  
Kent College, Pembury  
Kent County Council (EYPS Directorate)

Kimbolton School, Huntingdon  
King Edward VI High School, Stafford  
Knowsley Council Education Improvement Team  
Lady Eleanor Holles School, Hampton  
Lambeth Council, Lambeth School Services  
Lancashire Adult and Children's Safeguarding Board  
Leeds City Council Childrens Services/LSCB  
Leicester City Council  
Little Heath School  
Liverpool City Council, School Improvement Liverpool  
London Borough of Haringey  
London Fire Brigade  
London Grid for Learning  
LPCCA  
Mander Portman Woodward  
Maples Children's Centre, London  
Marland School, Torrington  
Milton Keynes Council/Safeguarding Children Board  
Mount School, York  
NAHT  
NASUWT  
National Association of Independent and Non-Maintained Special Schools (NASS)  
National SEND Forum  
NUT  
NEN-The Education Network  
Newcastle College  
Newland College, Chalfont St Giles  
Newtons Primary School, Havering  
Norbury School, Harrow  
North Tyneside Council  
North Yorkshire County Council  
Nottinghamshire County Council  
NSPCC  
Oakwood Park Grammar School  
Ofsted  
Open Rights Group  
Oxfordshire County Council, Schools and Learning  
Parent Zone  
Pattison College  
Perton Sandown First School, Wolverhampton  
Peter Symonds College, Winchester  
Peterborough City Council/Peterborough Safeguarding Children Board  
Peterborough School  
PSHE Association  
Queen Margaret's School, York  
RADIUS Trust  
Ramshaw Primary School, Evenwood  
Ravensmead Primary School  
RDI(UK) Holdings Ltd (Friendly WiFi)  
Relate  
RNIB College, Loughborough

Royal High School, Bath  
Safer Recruitment Consortium  
Schools Inspection Service  
Seashell Trust  
Services for Education, Birmingham  
Sex Education Forum  
Shrewsbury House School, Surbiton  
Shropshire Council  
Sidegate Primary School, Ipswich  
South Essex College of Further & Higher Education  
South West Grid for Learning/Avon & Somerset Police  
South West Safeguarding in Education Group  
Southampton Alnisaa Association  
St Albans High School for Girls  
St George's CE First School, Redditch  
St Helen and St Katherine School, Abingdon  
St Helen's School, Northwood  
St John's Primary School, Kidderminster  
St Jude and St Paul's CE Primary, Islington  
St Neots School  
St Nicholas Preparatory School, London  
St Paul's CoE Primary School, Addlestone  
St Paul's Girls' School, London  
St Paul's School, London  
St Maxentius CE Primary School, Bolton  
Stockport Grammar Junior School  
Stonewall  
Stratford upon Avon College  
Sultania Hidayat UI Quran  
Sunderland College  
Surrey Secondary Heads' Council  
SWGfL  
Terrence Higgins Trust  
Together Trust  
UCISA  
University of Bedfordshire International Centre, researching child sexual exploitation,  
trafficking and violence  
Ursuline College, Westgate on Sea  
Voice  
Wandsworth Borough Council  
Wednesbury Oak Academy, Tipton  
Whiteheath Infant and Nursery School, Hillingdon  
Whitley Bay High School  
Wokingham Borough Council, Children's Services  
Wolverhampton City Council  
Wood End School, Stantonbury  
Woodfield Academy, Redditch  
Worcestershire County Council



Department  
for Education

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