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# Safeguarding peer reviews

School trust leaders have, rightly, consistently reported safeguarding as an overriding priority for them. Pupils - and staff - must feel safe in school in able to learn.

There is much established good practice in safeguarding, but official guidance has failed to respond to emergence of school trusts as the responsible body for the majority of schools in England, focusing predominantly at a school level.

This is a missed opportunity, and one the Confederation of School Trusts, and in particular our Safeguarding Professional Community, is keen to address.

One way of ensuring good practice is a trust-led peer review process across its constituent schools. This paper sets out a set of principles for a coordinated approach to safeguarding peer reviews and a framework for the areas these reviews might cover. It is not intended as a checklist or template, but rather a framework that trusts can consider when creating their own peer review processes.

It guidance was created in partnership with sector experts and safeguarding leads drawn from CST member trusts; we thank them for their contributions.

This document should be read in conjunction with our <u>Safeguarding at scale</u> guidance, which sets out a range of models for the effective management of safeguarding in a trust context. As we state there: "The leadership and management of safeguarding in school trusts can be more complex. There is still a need to maintain board-level assurance, but leaders may not have the same granular knowledge of circumstances on the ground."

A quality peer review approach in schools should be designed to provide that knowledge.

## How to use this guidance

 Develop an internal peer review process using the framework and principles as a guide.

• Utilise the peer review to create development and progression opportunities with colleagues within your trust community.

• Establish or join a network where shared resources and knowledge supports the embedding of good practice aligned with the principles and peer review framework.

A note on the wider context for safeguarding audits

The 2024 Labour manifesto included "a new annual review of safeguarding, attendance, and off-rolling" but since taking office the Government has not published any further details.

Some trusts have voiced concern about duplication caused by local authorities requesting their own bespoke safeguarding audits. Our aim with this guidance is, in part, to work towards eliminating that duplication by demonstrating the thoroughness and professionalism of trust audits, which should serve as sufficient assurance of compliance with all statutory requirements.



# Principles underpinning an effective peer review process

Effective trust safeguarding peer reviews are grounded in principles that ensure comprehensive, transparent, and actionable assessments that develop and improve practice. These principles help ensure that reviews provide value by offering clear insights and fostering accountability. They support a holistic and effective safeguarding review that goes beyond simple compliance, aiming instead to foster a genuinely safe, supportive, culture of safeguarding for all students and staff within a school, to allow them to thrive.

#### Principles of peer reviews

#### 1. The 'why' - the objectives of the peer review

- 1.1. **Assurance**: Reviews provide evidence of compliance to safeguarding standards and practices to ensure they comply with statutory requirements and meet the expectations of the trust in terms of quality, processes, and procedures. As stated in the CST paper, *Safeguarding at scale*: "This is about reviewing reality. The plan should set out how delivery of safeguarding will be assured, and standards improved. A strategic model offers several advantages over the traditional 'silo' approach, by enabling the trust to offer effective internal challenge, and to monitor and ensure improvements take place."
- 1.2. **Consistency of practice**: Reviews ensure consistency of practice across academies within the trust in terms of policy, people, and practice. As we stated in *Safeguarding at scale*: "Consistency is important to maintain and improve safeguarding excellence, protect the integrity of the trust's approach, and, most importantly, deliver best outcomes for children and families."
- 1.3. **Empowerment and development**: Reviews are a positive, welcome, and beneficial experience for all concerned and feel "done with" and not "done to". The aim is to create a process that feels collaborative and developmental, creating a culture of openness, psychological safety and continuous learning whilst allowing staff to develop and improve their practice.
- 1.4. **Continuous process, not a one-off**: Reviews are a part of an ongoing quality assurance process throughout the year, not a standalone event. They encourage reflective practice whereby the school and trust continuously review and refine safeguarding practices based on review findings and other feedback routes.

#### 2. The 'what' - the expected outcomes of a peer review

- 2.1. **Identifying excellent practice**: The starting point of any peer review is to identify and affirm examples of excellent practice within the school, with the aim of sharing it more widely across the trust and wider safeguarding professional community where appropriate.
- 2.2. **Identifying potential areas for development**: Reviews also identify areas of practice within the school that could be improved. Emphasis is placed on findings that could significantly impact safeguarding at the school, rather than issues that do not affect overall performance.
- 2.3. **Actionable recommendations**: Reports provide specific recommendations to address any issues, enabling the school to take constructive action.

Consideration is undertaken of the use of SMART recommendations (Specific, Measurable, Achievable, Relevant, and Time-Bound) to enable the school to determine prioritisation of actions following the review.

#### 3. The 'who' – The right people for an effective review process

- 3.1. **Reviewers**: To engender confidence in the review process and ensure it is effective, review teams are composed of the right members, who demonstrate expertise and knowledge and are trained in how to conduct collaborative, developmental reviews.
- 3.2. **Type and purpose of the review**: The composition of the review team can and should vary from review to review, based on the type of school, type of review and purpose of the review.
- 3.3.**School staff involved**: Where specific areas of safeguarding are being reviewed, the appropriate school staff members are directly involved to represent the practice area, for example: special educational needs coordinator, senior attendance champion, designated teacher for looked after children.

#### Good peer review practice

#### 1. Accountability and transparency

- 1.1. **Clear documentation and record-keeping**: All actions, decisions, and outcomes are well-documented to provide a clear review trail.
- 1.2. **Openness in reporting**: Review findings and recommendations are transparently shared with all relevant stakeholders.

#### 2. Inclusivity and equality

- 2.1. **Consideration of additional needs**: Safeguarding reviews are inclusive, covering children with special educational needs, disabilities, LGBTQ+ pupils, and those from diverse cultural backgrounds.
- 2.2. **Stakeholder engagement:** Staff members, volunteers, and governance can access and engage with the review process effectively and equitably, regardless of any protected characteristics or additional needs.

#### 3. Continuous improvement and learning culture

- 3.1. **Up-to-date knowledge and skills**: Any staff training and policy updates reflect emerging safeguarding trends, issues or concerns, legal updates, and emerging leading practices.
- 3.2. Responding to incidents, near misses and serious child safeguarding cases: There is an emphasis on learning (both at local and trust level) from safeguarding incidents, serious case reviews, or close calls to help identify improvements to safeguarding, promote the welfare of children, and to prevent or reduce the risk of recurrence of similar incidents.

#### 4. Thoroughness and objectivity

#### 4.1. Evidence-based evaluation:

- a. Reviews are undertaken in accordance with statutory safeguarding guidance for schools and colleges on safeguarding children and safer recruitment, and *Keeping children safe in education* and *Working together to safeguarding children* are used to guide the safeguarding review process.
- b. All findings and recommendations rely on concrete evidence, such as

records, policy documents and case examples, rather than assumptions.

#### 4.2. Unbiased assessment:

- a. Reviewers are objective, avoiding any conflicts of interest or undue influence from the school's staff or leadership.
- b. Any self-assessments by the school are validated by trust-level or external review where appropriate or to provide subject matter expertise. This might include trust-to-trust peer review processes.
- 4.3. Full coverage of agreed areas: The programme of review ensures all agreed safeguarding areas are evaluated at some point in the cycle from policies and staff training to pupil wellbeing and online safety and that there are no gaps in the assessment process, whether as part of an annual programme or single visits.

#### 5. Confidentiality and sensitivity

- 5.1. **Protection of confidential information**: Sensitive information, especially about individual students or incidents, is handled securely and only shared in the best interest of the child and in line with data protection regulations.
- 5.2.**Sensitivity to potential triggers**: Any discussions with students and staff about safeguarding issues are mindful of their experiences and emotional needs.



# Areas of safeguarding peer review

For ease of reference, we refer to 'school' throughout this section but, as advocated in our *Safeguarding at scale* guidance, we recognise that depending on size and staffing arrangements, specific responsibilities and policies may not always be owned at school level. Headteacher and other role titles should be read to include equivalent roles.

In establishing and administering reviews, trusts should clearly identify where responsibilities lie and ensure that for any items not covered in school-level reviews there is suitable equivalent assurance at cluster or trust level.

#### 1. Leadership and governance

- 1.1. **Roles and responsibilities**: Individuals accountable for safeguarding roles, including safeguarding trustees, local governance, school leadership and designated safeguarding leads (DSLs) have clearly defined roles and are held accountable.
  - a. The headteacher holds primary accountability for safeguarding in their school, but delegates responsibility to the DSL.
  - b. There are robust mechanisms in place for the headteacher to assure themselves that the DSL is fulfilling their role effectively.
  - c. All staff understand their roles and responsibilities within safeguarding from 'safeguarding is everyone's responsibility' to the specific duties around the DSL role, and this is clearly demonstrated.
- 1.2. **Monitoring, internal, and external assurance systems**: The school has effective systems for monitoring safeguarding practices, supported by internal and external assurance mechanisms.
  - a. Trustees hold accountability for safeguarding across the trust and there are robust mechanisms for providing assurance to the board at each school within the trust.
  - b. Board assurance derives from multiple sources to ensure accuracy, reliability, and triangulation, including local- and trust-level reviews.
  - c. Local authority partners are assured that trust practice is consistent with the local multi-agency safeguarding arrangement.

#### 2. Building a safeguarding culture

- 2.1. **Promoting and leading**: The school promotes a positive safeguarding culture where everyone is vigilant and empowered to report concerns, making safeguarding a part of everyday school life. Leadership is demonstrably authentic, transformational, and values led. In particular, pupils have multiple options and opportunities to express concerns or make disclosures and contribute to the safeguarding culture within the school and systems capture children's views, opinions, and concerns.
- 2.2. **Clarity and communication**: Clarity of safeguarding mission and strategy is understood by all staff who buy into shared goals and responsibility for children's best interests in addition to individual transaction responsibilities. Clear, consistent, communication demonstrates long-term focus on shared goals rather than tasks.
- 2.3. **Co-construction, codification, and collaboration**: The school plans for deliberate and effective implementation of strategies that curate a culture of safeguarding through co-construction, codification, and feedback. Adults work together collaboratively both within the school and with

trust colleagues. Through deliberate, meaningful challenge linked to the best interests of children, they promote a coherent one team approach. Appropriate time and capacity are given to ensure that safeguarding practice meets the needs of all children. This is kept demonstrably under review.

#### 3. Contextual safeguarding

#### 3.1. Local context:

- a. The school can demonstrate a solid understanding of local community issues that might impact on the safeguarding of children and contextualises its approach through consideration of these issues.
- b. The school's safeguarding policies consider the wider contextual needs and risks of the community as well as school-level trends, identified through effective monitoring, data analysis, and pupil and stakeholder feedback.

#### 3.2. School context:

- a. The school is aware of internal school-level contextual issues and trends through robust monitoring and data analysis.
- b. All staff are aware of external local contextual safeguarding risks and school specific trends, raised through regular training and updates.
- c. The safeguarding curriculum is designed with local risks and needs in mind, allowing space for dynamic response to local issues.
- d. Pupil voice is actively sought and captured in response to contextual safeguarding concerns, to inform pastoral support responses, staff training and dynamic change within the curriculum.
- e. The school can demonstrate areas of risk in respect of the school site and what is in place to reduce risk.

#### 4. Proactivity and preventative focus

#### 4.1. Early intervention:

- a. The school's policies and practices identify and support vulnerable students as issues become apparent, including ensuring diverse ways for disclosures to be made, recognising the voice of the child and parents and carers.
- b. Data is analysed to establish greatest risks and harms to drive strategic prevention campaigns.
- c. Stakeholder voice is actively sought on a regular basis and informs practice development.

#### 4.2. Proactive risk assessment:

- Risk assessments consider all students, are part of routine safeguarding practice, anticipate potential issues, and act pre-emptively, as evidenced within site, health and safety, educational visits, and pupil risk assessments.
- b. There are formal risk descriptions, with relevant and monitored risk controls to detect, monitor, and prevent risks. Risk reporting is both through risk categories and through exemption reporting (for individual risks).
- c. Risk is managed through categories relating to culture and strategy in addition to safeguarding compliance elements.

#### 5. Training, development, and awareness

- 5.1. **Culture of continuous learning:** Knowledge transfer and training is targeted and relevant, and designed to ensure clear frameworks for consistent decision making in practice and professional behaviours. There is continual development for expert leadership and knowledge of safeguarding, including of emerging safeguarding risks. Organisational learning and feedback are systematised, sought, and valued. There is ongoing self-review and improvement in addition to external monitoring.
- 5.2. **Induction procedures**: Induction processes and training ensure all new staff and local governance and other volunteers fully understand their personal roles and responsibilities, and the expectations around safeguarding practice and protocols. This includes those who start at any point during the year.

#### 5.3. Staff training:

- a. Initial, regular, and ongoing school-relevant training and knowledge transfer for all staff is in place and includes the latest statutory guidance (for example, *Keeping children safe in education*), arising contextual issues, and new and emerging safeguarding concerns.
- b. Training and knowledge transfers include scenario-based activities to align professional safeguarding behaviours and collective decision making and is regularly reviewed and evaluated.
- c. At least annually, staff receive outcomes-focused training where staff knowledge is measured, knowledge gaps are identified, and a plan is created to plug those gaps.

# 5.4. Specialist training for DSLs, safeguarding teams, trustees, and local governance tier:

a. All DSLs and safeguarding teams, as appropriate, receive their statutory training as detailed in *Keeping children safe in education* and updated every two years.

b. DSLs and safeguarding teams receive regular enhanced high-quality training on specific safeguarding issues and protocols within their local authority.

c. Safeguarding trustees and those with safeguarding governance receive training and development to enable them to fulfil their role effectively.

5.5. **Record-keeping for training**: Safeguarding training records of all staff, volunteers, and governance are accurate, up-to-date and show compliance with required training intervals. Systems are in place to ensure this is clear and accessible as required.

#### 5.6. School curriculum:

- The curriculum covers and promotes safeguarding awareness across the full range of subjects. This aligns with the national context, the context of the school and any specific local issues.
- b. Staff receive the appropriate training to effectively deliver the safeguarding curriculum with confidence.
- 5.7. **Engagement with families and the community**: The school is an active participant in



strengthening safeguarding in families and the local area, by signposting to services, offering support and delivering training where appropriate, for example online safety.

#### 6. Policies and procedures

- 6.1. **Trust and school policies**: Policies are the primary means of communicating expectations, standards, and practices:
  - a. Safeguarding policies are reviewed annually, and others are reviewed at intervals appropriate to the policy and statutory requirements, never extending beyond three years. To ensure accuracy and relevance, policies are easily accessible and reflect statutory requirements and prevailing best practice.
  - b. Safeguarding is woven into all other relevant policies.
- 6.2. Identifying and reporting concerns, handling, and escalating: Staff have sufficient knowledge to identify and report safeguarding issues, including signs of abuse, neglect, and exploitation, in line with procedures outlined by their academy and trust. There is a specific process for escalation of incidents to trust leaders without delay.
- 6.3. **Early help and referrals:** Early help frameworks and local thresholds are used for making referrals to external safeguarding partners.
- 6.4. **Handling and escalation procedures**: The school can act as an advocate for the child when challenging or escalating safeguarding concerns.

#### 7. Staffing and recruitment

- 7.1. Allegations about staff and volunteers:
  - a. Allegations policy and procedures: Allegations are managed in line with clear reporting and recording structures within the trust, from low-level concerns to those issues that reach the threshold for the involvement of the Local Authority Designated Officer, and all staff are aware that they have a statutory responsibility to report all concerns about adult behaviours.
  - b. **Support for staff and students during investigations**: Appropriate support is provided to involved parties during safeguarding investigations.
  - c. **Record keeping of allegations**: Documentation processes for allegations ensure confidentiality and secure record storage.
- 7.2. **Safer recruitment checks and vetting:** All staff and volunteers have the appropriate checks undertaken before commencing their roles, with appropriate follow-ups on flags, in line with statutory employment check requirements contained in *Keeping children safe in education*.
- 7.3. **Single Central Record (SCR):** The SCR accurately records all required statutory staff information, checks, and dates and any additional information as required by trust policy.
- 7.4. **Code of conduct:** Staff codes of conduct appropriately reflect safeguarding principles.
- 7.5. **Staff declarations:** All staff confirm annually that they have fulfilled safeguarding requirements, such as reading Part 1 of *Keeping children safe in education*, and make any declarations that may have an impact on their role in school.

#### 8. Health and safety

- 8.1. **Risk assessments and safety protocols**: The school can demonstrate the use of robust risk assessment practices, including, but not exclusively, around school trips, physical education, and emergency procedures including invacuation and evacuation incidents.
- 8.2.**Building and premises security**: Security measures are in place to control access to the school premises, including visitor management.
- 8.3. **Medical and first aid provision**: Appropriate on-site medical and first aid resources are available, and procedures are in place for accommodating long term illness, managing injuries, or health emergencies, including where medical assistance needs to be administered off-site, such as during school trips.

#### 9. Data and recording-keeping systems

9.1. **Data collection, sharing and data protection**: Protocols for sharing information securely with relevant agencies, while ensuring data protection pursuant to the UK General Data Protection Regulation and related legislation.

#### 9.2. Reporting and record keeping:

- a. The school makes effective, appropriate, and consistent use of any safeguarding management systems in line with trust policy. Records include a clear and comprehensive summary of concerns, details of how concerns were followed up and resolved, including rationales, and notes of any action taken, decisions reached, and the outcome. Relevant documents are held on file.
- b. Records demonstrate how staff have implemented relevant interventions in a timely manner and reflect the impact of interventions, including a clear and measurable outcome towards supporting the pupil's well-being and safety.
- c. Records clearly document and identify pupil voice, parent voice, and staff voice, ensuring that the perspectives of all stakeholders are accurately reflected and considered in safeguarding and decisionmaking processes.
- d. Processes are in place to allow leaders to harvest and use safeguarding data effectively, to understand and respond to vulnerability and emerging needs within the academy.

#### 10. Online safety and digital safeguarding

- 10.1. **Filtering and monitoring of digital content**: Digital filtering and monitoring systems prevent exposure to inappropriate or harmful content, identify pupils at risk and trends in online access that can be addressed in curriculum delivery, pursuant to filtering and monitoring in <u>Meeting digital and technology standards in schools and colleges</u>.
- 10.2. **Digital literacy and online safety education**: The curriculum covers online safety, good digital citizenship, and awareness of cyber risks.
- 10.3. **Incident reporting and response**: Online safety incidents are diligently reported, investigated, and documented in a timely manner. Support is then offered to the pupil, and staff receive relevant training.

#### 11. Inclusion, pupil wellbeing, and pastoral care

#### 11.1. Mental health and wellbeing support:

- a. Resources and programs are readily available, including access to whole school support, mentoring and counselling services and referrals to specialist provision.
- b. Strategic actions are in place to deliver whole school mental health interventions, planned, and implemented by trained mental health leads.

#### 11.2. Anti-bullying initiatives:

- a. The school culture ensures children thrive, feel safe, and respected with a strong sense of belonging.
- b. The school has a proactive anti-bullying curriculum that is clear and well-implemented.
- c. The school has a strong culture around anti-bullying with consistent reporting processes and systems which are effective in reducing or eradicating bullying.

#### 11.3. Support for vulnerable pupils:

- a. There is targeted support for children with specific needs, including special educational needs, disabilities, looked-after children, and young carers.
- b. There are systems and processes used to identify vulnerable pupils and families and track the impact of provision offered.
- c. The school works in partnership with local and national Early Help agencies.

#### 11.4. Inclusive approaches for all pupils:

- a. Safeguarding approaches are inclusive, and consideration is given to any particular needs of pupils such as LGBTQ+ pupils and those from diverse cultural backgrounds.
- b. All children have access to support services, safeguarding information, and solid and reliable reporting mechanisms.

#### 11.5. Behaviour, attendance, and other related issues:

- a. The school can provide clear evidence of its adherence to the <u>Working together to improve attendance</u> guidance and trust-led attendance policies, demonstrating proactive strategies, consistent processes, and effective monitoring to promote high attendance and address barriers to pupil engagement.
- b. Clear processes are in place to support pupils for the commissioning and audit of Alternative Provision settings used by the school. Ensuring tailored interventions, collaboration with families and providers, with clear documentation of actions and outcomes to reintegrate pupils into mainstream education successfully.
- c. Robust processes are in place to support pupils through the Emotionally Based School Avoidance (EBSA) pathway, ensuring tailored interventions, collaboration with families and external agencies, and clear documentation of actions and outcomes to reintegrate pupils into education successfully.
- d. Effective monitoring, tracking, and recording systems support the school leaders to address absence concerns including the impact of

punctuality on whole school attendance.

#### 12. Collaboration and multi-agency engagement

#### 12.1. Coordination with external agencies:

- a. The school understands its position as part of a wider safeguarding system for children and can evidence how its work is underpinned by the guiding principles within the statutory guidance <u>Working together to safeguard children</u>.
- b. The DSL, senior leaders and those in governance understand local safeguarding partnership arrangements and local priorities, enabling the implementation of proactive measures, delivering timely responses to emerging risks.

#### 12.2. Multi-agency working:

- a. The school works proactively and effectively to ensure all pupils with identified needs are well supported. The school works collaboratively with external agencies to ensure multi agency plans are in place for pupils with identified barriers to their learning and engagement.
- b. Where pupils have access to a social worker, the DSL works collaboratively with the social worker to ensure a coordinated approach to keeping the child safe from harm.

#### 12.3. **Community awareness**:

- a. The school reflects the trust's approach to civic engagement, acting as key institution its community.
- b. All staff have an awareness of the contextual needs of the local community and presenting risks beyond the home and school environment.

c. Initiatives are in place to raise safeguarding awareness amongst the wider school community, with the school securing expertise from external professionals when addressing local priorities such as knife crime and child criminal and sexual exploitation.



#### Task and finish group

Chair: Jon Needham, Oasis Community Learning
Sue Bailey, Arthur Terry Learning Partnership
Sarah Bloomer, National Association of Academy
Safeguarding Advisors
Amy Daniels, Cornwall Education Learning Trust
Kay Davis, Prince Albert Community Trust
Louis Donald, Creative Education Trust
James Down, Brooke Weston Trust
Brian Duffy, Shaw Education Trust
Dai Durbridge, Browne Jacobson
Kevin Hartley, NSPCC
Nicola Law, Liberty Academy Trust
Phillip Painter, Humber Education Trust
Samira Sadeghi, Confederation of School Trusts
Owen Walters, Anthem Schools Trust







### **Confederation of School Trusts**

Suite 1, Whiteley Mill 39 Nottingham Road Stapleford Nottingham NG9 8AD

0115 9170142

cstuk.org.uk