



NATIONAL ONLINE SCHOOL

Safeguarding Offsite

Approved by TCES Operational Board on behalf of

Thomas Keaney, CEO and Schools' Proprietor

Date of next formal review, Sept 2024

This policy applies to TCES National Online School

Contents

| | |
|--|----|
| Introduction | 3 |
| Procedure | 4 |
| Appendix A – Safeguarding Confirmation for schools/colleges subject to KCSIE 2022..... | 5 |
| Appendix B – Safeguarding Confirmation for providers not subject to KCSIE 2022 | 6 |
| Appendix C – Joint Risk Assessment – To be completed by providers and TCES National Online School..... | 7 |
| Appendix D – Activity Authorisation | 8 |
| Appendix E – College Placement Authorisation | 9 |
| Appendix F – Off-Site Provision Cover Sheet | 10 |
| Appendix G – Provision Monitoring Form..... | 11 |
| Appendix H – Safeguarding Policy Audit Tool | 12 |

INTRODUCTION

TCES National Online School is committed to safeguarding all of its students as outlined within our safeguarding policy which provides procedural guidance on how to respond to safeguarding concerns. To support the unique abilities of students accessing education through the National Online School, there are also occasions when off-site opportunities to support them with additional skills (including work experience where possible), this may result in them being in receipt of services provided by other agencies and organisations. When students are attending these other agencies and organisations, the safeguarding responsibility for a student is retained by the online school. All TCES Schools have a responsibility pursuant to the Education (Independent School Standards) (England) Regulations 2014 to ensure that they 'promote the welfare of students at the school'.

Keeping Children Safe in Education (KCSIE) 2022 statutory guidance outlines the retention of safeguarding responsibility for schools when placing with an alternative provider noting that where a school places a student with an alternative provision provider, the school continues to be responsible for the safeguarding of that student and should be satisfied that the provider meets the needs of the student. Schools should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff. Similarly, schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.

It is important to note that not all organisations/agencies that are identified as suitable for off-site provision will be governed by statutory guidance and, as such, the standards of safeguarding that schools (including online schools) are operating to may not be embedded within these organisations. In addition, not all organisations/agencies that are identified as suitable for off-site provision will have their safeguarding practice overseen by regulatory bodies (such as Ofsted) in the same way that schools are overseen.

Procedurally, it is therefore proportionate to consider two different approaches to auditing the safeguarding practice and standards expected from off-site providers who may be considered suitable to deliver services to TCES National Online School students:

- 1) For those providers to whom Keeping Children Safe in Education applies, namely maintained schools and colleges, independent schools (including academies, free schools and alternative provision academies), non-maintained special schools and student referral units (PRUs) and where there is regulatory oversight whose reports are publicly available.
- 2) For those providers who do not have regulatory oversight and to whom Keeping Children Safe in Education 2022 does not apply but whose practice is guided by Working Together to Safeguarding Children 2018 and (in many instances) the non-statutory guidance contained within 'Keeping Children Safe in Out of School Settings'.

Please note that this process was previously referred to as the "section 11 process".

PROCEDURE

In order for TCES National Online School to ensure that students are effectively safeguarded whilst attending an off-site provision, the following process needs to be followed PRIOR to any agreement for students to attend that provision.

- 1) The safeguarding arrangements in place within the provision need to satisfy the National Online School that they are suitable and in line with the safeguarding expectations for students. This should be established with the use of the relevant safeguarding confirmation in Appendix A (for provision whose organisation/agency is subject to KCSIE 2022 guidance – see above) or Appendix B (for provision whose organisation/agency is not subject to KCSIE 2022 guidance – see above).
- 2) Any proposed off-site provision must have a joint risk assessment completed and signed off by both the off-site provision and TCES staff member who will have met relevant staff and visited the provision to ensure its suitability – Appendix C.
- 3) Any Activity being undertaken off-site must be approved by the National Online School SLT – Appendix D
- 4) Any agreed college provision must be approved by the Schools Proprietor – Appendix E
- 5) Consent must be sought and obtained by the relevant individual/s who hold parental responsibility for the child. If the provision is proposed to be for a 'Care Experienced' child (commonly referred to as 'Looked After Child'), clarity should be sought from the Designated Safeguarding Lead (DSL) as to who holds parental responsibility for the child prior to consent being sought.
- 6) All paperwork must be signed off and stored in a separate off-site provision folder with relevant contact details disseminated to those who have a need to know in order to management both practical and potential safeguarding arrangements. A front sheet for this folder is included in Appendix F.
- 7) Off-site provision that continues to be in use should be subject to routine monitoring of their safeguarding practice on an annual basis with any updated information recorded within the folder. Appendix G should be used to support reviews for these providers.
- 8) Any provider operating as a 'sole trader' or individual, should be included on the commissioning schools' Single Central Register (SCR) alongside the required checks for this register alongside an appropriate Risk Assessment.

For staff involved in the scrutiny of the prospective provider's Safeguarding Policy, there are a number of basics that should be in place to make it compliant with both TCES expectations but also the provider's statutory duty. Appendix H is a tool devised to support this process. Should any queries arise, these should be raised with the DSL for the online school.

If the requirements of the provision are not deemed to be met, TCES National Online School will not be authorised to use the provision and the DSL notified for consideration of escalation to the relevant LADO (should the provision be providing services to other children and not have the required statutory safeguarding arrangements in place). If the organisation can demonstrate at a later time that the standards are fully met, then the National Online School may review their decision and undertake the above process from the beginning. Caution needs to be applied to those providers that have failed in their evidencing of suitable safeguarding arrangements previously and a consultation with the DSL should take place to consider how embedded organisational safeguarding practice may be at the proposed provision.

APPENDIX A – SAFEGUARDING CONFIRMATION FOR SCHOOLS/COLLEGES SUBJECT TO KCSIE 2022

| | | |
|---------------------|------------------|--|
| Organisation: | | |
| Address: | | |
| Contact Name: | Email Address | |
| Position: | Telephone number | |
| Name of DSL: | Email Address | |
| Position: | Telephone number | |
| Name of deputy DSL: | Email Address | |
| Position: | Telephone number | |

In line with the responsibilities outlined within to the Keeping Children Safe in Education 2022 statutory guidance, TCES is required to ensure that the safeguarding arrangements that are in place within any organisation providing off-site provision for its students are sufficient.

As a registered education provider, please could you confirm the following:

- 1) I confirm that our school/college is regulated by either Ofsted or the Independent Schools Inspectorate.
- 2) I confirm that our school/college is fully compliant with its safeguarding requirements as outlined within Keeping Children Safe in Education 2020 and Working Together to Safeguard Children 2018 statutory guidance.
- 3) I confirm that appropriate safeguarding checks have been carried out on individuals who will come in to contact with students in line with expected safer recruitment practice. This includes, but is not limited to, undertaking enhanced DBS checks and criminal record checks for overseas applicants.
- 4) I confirm that any concerns/incidents/notable event that relates to a TCES student will be shared with the Designated Safeguarding Lead (DSL) and/or Head Teacher for the student's school as soon as is practicable. This includes, but is not limited to:
 - a) concerns for a student's welfare including any safeguarding concerns.
 - b) student non-attendance (notification to be provided on the same day regardless of the reason provided).

Name of TCES School DSL:
Contact Email:
Contact Telephone:

Name of TCES School Headteacher:
Contact Email:
Contact Telephone:

School / College Signature:

Position (must be DSL / Headteacher):
Contact Email:
Contact Telephone:
Date:

APPENDIX B – SAFEGUARDING CONFIRMATION FOR PROVIDERS NOT SUBJECT TO KCSIE 2022

| | | |
|---------------------|------------------|--|
| Organisation: | | |
| Address: | | |
| Contact Name: | Email Address | |
| Position: | Telephone number | |
| Name of DSL: | Email Address | |
| Position: | Telephone number | |
| Name of deputy DSL: | Email Address | |
| Position: | Telephone number | |

In line with the responsibilities outlined within to the Keeping Children Safe in Education 2022 statutory guidance, TCES is required to ensure that the safeguarding arrangements that are in place within any organisation providing off-site provision for its students are sufficient.

As a setting offering off-site provision for a TCES student/students, please could you confirm the following:

- 1) I confirm that our provision is fully compliant with its safeguarding requirements as outlined within Working Together to Safeguard Children 2018 statutory guidance [and Keeping Children Safe in Out of Schools settings non-statutory guidance] – delete where not applicable.
- 2) I confirm that appropriate safeguarding checks have been carried out on individuals who will come in to contact with students in line with expected safer recruitment practice. This includes, but is not limited to, undertaking enhanced DBS checks and criminal record checks for overseas applicants.
- 3) I confirm that I have provided the following policy documentation for review:

| Documentation | Date of Receipt |
|---|-----------------|
| 1. Safeguarding / Child Protection Policy | |
| 2. Whistleblowing Policy (where not included in 1) | |
| 3. Managing Allegations Against Staff Policy (where not included in 1) | |
| 4. Safer Recruitment Policy (where not included in 1) | |
| 5. Staff / Volunteer Code of Conduct | |
| 6. Health and Safety Policy | |
| 7. Complaints Procedure | |
| 8. Information Sharing / Data Protection Policy | |
| 9. Equality and Diversity Policy | |
| 10. Risk Assessment in relation to provision / activity (to be completed jointly) | |
| 11. Employer Liability Insurance | |
| 12. Public Liability Insurance | |
| 13. Service Level Agreement | |

- 4) I confirm that any concerns/incidents/notable event that relates to a TCES National Online School student will be shared with the Designated Safeguarding Lead (DSL) and/or Head Teacher for the student's school as soon as is practicable. This includes, but is not limited to:
 - a) concerns for a student's welfare including any safeguarding concerns.
 - b) student non-attendance (notification to be provided on the same day regardless of the reason provided).

Name of TCES School DSL:
Contact Email:
Contact Telephone:

Name of TCES School Headteacher:
Contact Email:
Contact Telephone:

Off-site Provision Signature_____

Position (must be Senior Leader for the Provision):
Contact Email:
Contact Telephone:
Date:

APPENDIX C – JOINT RISK ASSESSMENT – TO BE COMPLETED BY PROVIDERS AND TCES NATIONAL ONLINE SCHOOL

Risk Assessment in relation to Offsite Provision at:

Date:

Completed by (TCES Staff):

Completed by (Off-Site Provision Staff):

SLT Approval Provided by:

| Severity | Multiplier | | | | | |
|------------------------|------------|--------|----------|----------|----------|---------|
| Extreme / Catastrophic | 5 | 5 | 10 | 15 | 20 | 25 |
| Major | 4 | 4 | 8 | 12 | 16 | 20 |
| Moderate | 3 | 3 | 6 | 9 | 12 | 15 |
| Minor | 2 | 2 | 4 | 6 | 8 | 10 |
| Insignificant | 1 | 1 | 2 | 3 | 4 | 5 |
| | Multiplier | 1 | 2 | 3 | 4 | 5 |
| Likelihood | | Remote | Unlikely | Possible | Probable | Certain |

| | Key | |
|---------------|---------|---|
| Severe | 20 - 25 | Unacceptable level of risk exposure which requires immediate corrective action to be taken |
| Major | 12 - 16 | Unacceptable level of risk exposure which requires constant active monitoring, and measures to be put in place to reduce exposure |
| Moderate | 5 - 10 | Acceptable level of risk exposure subject to regular active monitoring measures |
| Minor | 3 - 4 | Acceptable level of risk exposure subject to regular passive monitoring measures |
| Insignificant | 1 - 2 | Acceptable level of risk subject to periodic passive monitoring measures |

| Details of Risk | To whom | Severity | Likelihood | SxL = Risk rate | Control measures | Further actions |
|-----------------|---------|----------|------------|-----------------|------------------|-----------------|
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

APPENDIX D – ACTIVITY AUTHORISATION

Type of Activity _____

Location / venue address _____

Reason for Activity _____

Activity Team Leader _____

Mode of transport _____

Date of proposed Trip / first session _____ No of sessions _____

| | |
|--------------------|--|
| Students Attending | |
| Staff Attending | |

Cost of Activity & transport per student per session _____

Total cost including staff attendance _____

Prior to approval Checklist: The following items must be attached to this sign-off sheet:

| | |
|--|--|
| Risk Assessment for Activity | |
| Completed Annex A / B [where required] | |
| Risk Assessment for transportation method | |
| Signed Individual Risk Assessment for each student | |
| Signed Parent/Carer consent form for each student | |

I confirm as Team Leader that the information above is correct.

Signed by _____ Name _____ Date _____

I approve the planned Activity for the students named above to take place on the date above (SLT only)

Signed by _____ Name _____ Date _____

APPENDIX E – COLLEGE PLACEMENT AUTHORISATION

This form must be completed and signed off by the Head Teacher in advance of any student attending the named college.

Name of College _____

Academic Year _____

Please confirm by ticking the box that the following documents / Information have been obtained / completed and are they attached to this form:

Signed letter head of confirmation from the college ☐

College's Safeguarding Policy (should be available on their website) ☐

College's Safer recruitment policy (may be part of the safeguarding policy) ☐

Completed Annex A form. ☐

Completed Risk Assessment ☐

Most Recent Ofsted Inspection Report ☐

Name of person completing the form: _____ Role _____

Signature _____ Date _____

Comments:

I confirm that students can be placed in the above-named college:

Name _____ Role _____

Signature _____ Date _____

APPENDIX F – OFF-SITE PROVISION COVER SHEET

| Student Name | Timetable | Enrichment | Provision | Provision Address | Provision Contact details | Provision Contact Name | Safeguarding Lead |
|-------------------------------|-------------------|-----------------------|------------------------------|---|--|------------------------|--------------------|
| <i>James Smith (e.g.)</i> | <i>Tues/Thurs</i> | <i>Online Tuition</i> | <i>Home Learning Service</i> | <i>1 HLS Street, London SW1 1AB</i> | Steve.james@homelearning.co.uk 01234 567 8910 | <i>Steve James</i> | <i>Nancy Smith</i> |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

APPENDIX G – PROVISION MONITORING FORM

| RED | Indicates that processes are lacking and need to be developed as a matter of urgency to meet minimum requirements for a specific standard. However, we will not be able to use this provider again. In all cases check with Head Teacher and Schools Proprietor | | | | | | | |
|--------------|---|--------------------------------------|--|------------------------|-----------------------------|-----------------|--------------------------------|--------|
| AMBER | Indicates that processes are in place, but they need to be reviewed or further improved for a specific standard. This must be a time limit for improvement | | | | | | | |
| GREEN | Indicates that the provider meets the standard fully with all processes in place and up to date, at least to the required minimum | | | | | | | |
| Provision | Date Off-Site Provision Commissioned | Updated Policies received (annually) | Employers and Public Liability Insurance expiry date | Dates Venue RA Checked | Activity Authorisation Date | SLA Expiry Date | Most Recent Lesson Observation | Signed |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

APPENDIX H – SAFEGUARDING POLICY AUDIT TOOL

The below checklist is a tool to support the reviewing of prospective off-site provider's Safeguarding Policies. This covers the basic requirements pursuant to Working Together to Safeguard Children 2018. If these areas are not present procedurally at the prospective provision, the relevant school seeking to use the provider of off-site provision will need to raise this with the provider for remedy and, if concerns around understanding or application remain, advise that their safeguarding arrangements are not suitable for the relevant student / students. If the latter is decided and staff are aware of other children using the setting, a discussion with the DSL is required to consider escalation to the local LADO / Safeguarding Children Partnership.

| Area for consideration | Yes / No | RAG Rating |
|--|----------|-------------------|
| Is the organisation's name and address clear? | | |
| Are the Designated Safeguarding Lead's (DSL) contact details clear? | | |
| Are there contact details for a Deputy DSL? | | Where Appropriate |
| Are there contact details for a Senior Lead for Safeguarding? | | |
| Is there reference to the relevant statutory guidance? (WTTSC, KCSIE) | | |
| Is there reference to the organisation's local partnership and procedures? (e.g. London Child Protection Procedures) | | |
| Does the Safeguarding Policy consider pathways to support for children (referrals for staff to DSL / referral from DSL to CSC for statutory support)? | | |
| Does the Safeguarding Policy consider escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies? | | |
| Does the Safeguarding Policy (or separate policy) include arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners? | | |
| Does the Safeguarding Policy (or separate policy) include whistleblowing processes? | | |
| Does the Safeguarding Policy (or separate policy) include safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check? | | |
| Does the Safeguarding Policy (or separate policy) include appropriate supervision and support for staff, including undertaking safeguarding training? | | |
| Does the Safeguarding Policy (or separate policy) include comment regarding a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services? | | |
| Does the Safeguarding Policy (or separate policy) include comment regarding staff being given a mandatory induction, which includes familiarisation with child protection responsibilities and the procedures to be followed if anyone has any concerns about a child's safety or welfare? | | |
| Does the Safeguarding Policy (or separate policy) include procedures for dealing with allegations against people who work with children? | | |
| Does the above include the details of the LADO to whom these allegations need to be reported to? | | |